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IN PRO PER  
UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

TAYLOR THOMSON,  
  
Plaintiff and Counterclaim  
Defendant  
vs.  
ASHLEY RICHARDSON,  
  
Defendant and Counterclaim  
Plaintiff

Case No.: 2:23-cv-04669-MEMF-MAR

DECLARATION OF ASHLEY  
RICHARDSON IN SUPPORT OF  
DEFENDANT/COUNTERCLAIMANT  
ASHLEY RICHARDSON'S OPPOSITION  
TO PLAINTIFF'S MOTION FOR PARTIAL  
SUMMARY JUDGEMENT

**DECLARATION OF ASHLEY RICHARDSON**

I, Ashley Richardson, declare as follows:

1. I am the defendant and counterclaimant in this action and am proceeding without counsel. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently thereto.

**No Local Rule 7-3 Meet-and-Confer Occurred: Basis to Strike or Deny Plaintiff's MSJ Under the Court's Standing Order**

2. At no time prior to the filing of Plaintiff's Motion for Summary Judgment did Plaintiff's counsel request a real-time meet-and-confer conference (by telephone, Zoom, or otherwise) to discuss the contemplated motion, the issues to be raised, the governing law,

DECLARATION OF ASHLEY RICHARDSON IN SUPPORT OF DEFENDANT/COUNTERCLAIMANT  
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JUDGEMENT -

1 the evidence, or any potential resolution, as required by Local Rule 7-3 and Judge  
2 Frimpong's Civil Standing Order.

- 3 3. The only communication I received from Plaintiff's counsel regarding the Motion for  
4 Summary Judgment before it was filed was an email sent on November 6, 2025, at  
5 approximately 11:31 p.m. Pacific Time, attaching a completed draft of Plaintiff's opening  
6 brief and stating: "Please find attached our portions of our Motion for Summary  
7 Judgment. Please return your portions within 14 days." That email did not propose any  
8 meet-and-confer call, did not raise specific issues for discussion, and did not mention  
9 Local Rule 7-3.
- 10 4. On October 28, 2025, I spent over seven (7) hours with the Plaintiff's counsel, in person,  
11 in their San Francisco offices during the course of my deposition. At least four (4)  
12 members of Plaintiff's counsel were present throughout the day. There was ample  
13 opportunity for Plaintiff's counsel to advise me about their intended Motion for Summary  
14 Judgment or to attempt to meet and confer or find an appropriate time to do so at a later  
15 date/time. Instead, Plaintiff's counsel did nothing. They were totally silent. In addition  
16 to the time we spent on record, I had casual conversations with Josh Yim, Esq. (counsel  
17 for Plaintiff) about where he lived in Los Angeles, as well as casual conversations in an  
18 elevator with Todd Harrison, Esq. about the drive time from my home to San Francisco,  
19 including discussing the area where I lived. These conversations provided ample  
20 opportunity for a meaningful discussion or at the very least an attempt to schedule a meet  
21 and confer for something as serious as an MSJ.
- 22 5. Contrary to what counsel alleges, I have always responded as promptly as possible to any  
23 meet and confer requests, I have never refused to participate in a meet-and-confer  
24 regarding the Motion for Summary Judgment, nor did I tell Plaintiff's counsel that any  
25 attempt to confer would be futile. To the contrary, throughout this case I have repeatedly  
26 requested meet-and-confer conferences and have made myself available on dates and  
27 times proposed by Plaintiff's counsel, including in connection with discovery disputes  
28 and Rule 37 issues. Examples of those communications are attached as Exhibits \_\_, \_\_,  
and \_\_ to this declaration.
- 29 6. For example, on July 29 and July 31, 2025, I wrote to Plaintiff's counsel "pursuant to our  
30 obligation to meet and confer" regarding Plaintiff's deficient responses to my document  
31 requests and asked counsel to provide their "earliest available for a meet and confer, no  
32 later than EOD Wednesday July 30th." Counsel did not schedule such a conference and  
33 instead accused me of having "no evidence" and "wholly ignor[ing] your discovery  
34 obligations." [cite to Ex.C & D]
- 35 7. Similarly, in early May 2025, Plaintiff's counsel offered a limited window on May 7 to  
36 meet and confer, and I immediately confirmed my availability for a 3:00 p.m. Eastern

1 Time conference and asked counsel to “confirm today’s meet and confer at 3pm EST,  
2 and the best method to contact.” [cite to Ex.G]

3 8. In September 2025, when counsel circulated a draft Rule 37 joint statement before any  
4 Local Rule 37-1 conference, I responded by citing Local Rule 37-2.2, explaining why  
5 their draft did not start my seven-day clock, and again stating that I, “remain available  
6 and willing to meet and confer in good faith and hope we can find a mutually workable  
7 time,” then proposing alternative times later that week. [cite to Ex.H]

8 9. I check my email regularly and am able and willing to participate in real-time meet-and-  
9 confer conferences when requested. If Plaintiff’s counsel had contacted me to schedule a  
10 call or Zoom conference to discuss the contemplated Motion for Summary Judgment, I  
11 would have participated in good faith, as I have done on prior occasions.

12 10. In addition, Plaintiff resisted producing Ms. Thomson for deposition for approximately a  
13 year, requiring me to file a motion to compel. Only after the Court granted that motion  
14 did Plaintiff finally agree to produce Ms. Thomson, and the earliest date Plaintiff offered  
15 was November 7, 2025 – one day after Plaintiff’s counsel sent its draft summary  
16 judgment papers. As of the date of this declaration, I have not yet received the certified  
17 transcript of Ms. Thomson’s deposition and therefore cannot fully incorporate her sworn  
18 testimony into my opposition to Plaintiff’s Motion for Summary Judgment.

19 11. Plaintiff resisted producing Ms. Thomson for deposition for approximately one year. I  
20 repeatedly requested dates beginning in late 2024. Plaintiff refused or ignored those  
21 requests, and I was finally forced to file a motion to compel.

22 12. Only after the Court granted my motion to compel did Plaintiff offer deposition dates,  
23 and Plaintiff insisted that the earliest available date for Ms. Thomson’s deposition was  
24 November 7, 2025. This was one day after Plaintiff emailed its draft summary judgment  
25 brief at 11:31 p.m. on November 6.

26 13. As a result of this delay, it became impossible for me to file my own motion for summary  
27 judgment. The Standing Order requires a reserved hearing date, a 63–14–7 schedule, and  
28 sufficient time to prepare a factual record. Because Plaintiff delayed Ms. Thomson’s  
deposition until November 7, I could not obtain her testimony or transcript early enough  
to prepare and file a motion of my own before the motion cut-off.

14. Plaintiff’s timing also prevented me from meaningfully opposing Plaintiff’s Motion for  
Summary Judgment. As of the date of this declaration, I still have not received the  
certified transcript of Ms. Thomson’s deposition. Her sworn testimony addresses central  
factual disputes. Without the transcript, I cannot properly respond to Plaintiff’s claimed  
“undisputed facts” or cite to the record as required.

15. I believe Plaintiff timed Ms. Thomson’s deposition to occur as late as possible in the  
summary judgment period in order to prevent me from using her testimony in either my  
own motion or in opposition to Plaintiff’s. As a self-represented litigant, I am severely

1 prejudiced by these tactics. Furthermore, I do not believe that Plaintiff's counsel's claim  
2 of "futility" regarding the meet-and-confer process regarding Plaintiff's Motion For  
3 Summary Judgment has merit nor do I believe it is being made in good faith.  
4

5 **DEFAMATION — SWORN FACTUAL STATEMENTS**

6 **Taylor did, in fact, make statements accusing me of fraud and theft to third parties**

7 16. I am aware that in her Motion for Summary Judgment, Taylor Thomson claims that I  
8 "cannot identify any specific statement" she made to any third party accusing me of fraud  
9 or theft and that my defamation claim is based only on vague speculation. That is not  
10 true. I can and do identify specific people, specific topics, and specific statements Taylor  
11 made about me to third parties outside this litigation.

12 17. In or about early 2023, after not hearing from highly regarded Film/TV director Catherine  
13 Hardwicke ("Twilight") for roughly a year despite our previously close relationship, I  
14 reached out to her directly to ask what had happened. Catherine and I had collaborated on  
15 several projects over the years; she had been both a professional contact. In 2012-2013 I  
16 worked as a digital media consultant for her Film "Plush", in 2015 we collaborated in  
17 depth on a television project titled "Sharp Teeth", in 2016 when I was working as an  
18 executive for the film and television company Insurgent Media, I brought Cat in to direct  
19 a project we had optioned "Three Little Lies". I relied on Cat as a professional colleague  
20 and trusted friend. When we spoke, Catherine told me, in substance, that Taylor had said  
21 I had "taken a secret kickback" and that I had essentially stolen from her in connection  
22 with the Persistence/XPRT transaction and other cryptocurrency trading. Catherine  
23 referenced Taylor's portrayal of me as dishonest with Taylor's money, and as someone  
24 who had betrayed Taylor's trust financially.

25 18. The way Catherine described it, Taylor conveyed that I had acted in a deceptive, self-  
26 interested way by taking money for myself without Taylor's knowledge. Catherine  
27 communicated that she was deeply disturbed by what Taylor had told her about me and  
28 that this was why she had pulled away from me. Prior to Taylor's statements, Catherine  
and I had a long-standing professional rapport, and there had been no conflict between us.  
The only new variable was Taylor's accusation that I had committed fraud or theft with  
Taylor's cryptocurrency.

19. In the period from approximately late 2021 through 2023, I received multiple, separate  
reports from individuals in my professional network that Taylor was telling people I had  
"stolen from her," "taken her money," "taken a secret kickback," or otherwise acted  
dishonestly with her cryptocurrency. These individuals included people in the film and  
television community, members of our shared social circle, and people connected to the



1 crypto and tech space. The reports were consistent with one another: that Taylor was  
2 telling people I had committed fraud, taken undisclosed money, or mishandled her assets  
for my own benefit.

3 20. Some of these individuals were unwilling to become formally involved or be pulled into  
4 litigation with a billionaire, but that does not change the fact that they told me, explicitly,  
5 that Taylor had described me as having stolen from her, taken a “secret kickback,” or  
6 committed fraud with her cryptocurrency. These were not vague impressions; they were  
direct communications to me that Taylor had accused me of criminal conduct.

7 21. Prior to the filing of this lawsuit, I also learned that Taylor had told mutual acquaintances  
8 and members of our social circle that I had “taken her money” and “stolen from her.”  
9 These people relayed Taylor’s statements back to me, and it was clear from their  
behavior that they believed Taylor’s version and now saw me as someone who had  
betrayed her financially.

10 22. In all of my years of knowing Taylor and in all of my dealings with her cryptocurrency, I  
11 never told anyone, including Taylor or any third party, that I had taken any secret or  
12 undisclosed payment from the XPRT purchase or any other transaction, because no such  
13 payment was ever received by me. The way Taylor has characterized my conduct—as if I  
secretly profited behind her back—is false, as more fully explained below.

14 23. To be absolutely clear: Taylor did make statements to third parties, outside this lawsuit,  
15 accusing me of fraud, theft, and taking a secret kickback. Those statements were repeated  
16 back to me by people who heard them directly from Taylor, including Catherine  
Hardwicke. Her assertion in the MSJ that no such publication exists is false.

17  
18 **Taylor’s accusations of fraud, theft, and a “secret kickback” are false**

19 24. In August of 2021 I helped facilitate Taylor’s purchase of XPRT and was the principal  
20 contact with Persistence, but I had no authority or discretion with respect to Taylor’s  
21 decision to invest or the amount she invested. Taylor decided the amount of XPRT to  
22 purchase on her own, and she ignored my recommendation that she purchase less because  
the investment was risky

23 25. When Taylor decided to purchase XPRT, while the two of us were having dinner at Nobu  
24 Malibu in early August of 2021, I proposed to Taylor that I receive a finder’s fee based on  
25 her purchase. I also proposed that I would vest the tokens and that the fee would be  
26 contingent on her investment being profitable after the one year vesting period. Taylor  
agreed and was enthusiastic about the idea of me sharing in the success of the investment.

1 I remember clearly that after that exchange Taylor would say to me that I could buy the  
2 dinners once I was rich.

3 26. As Taylor's XPRT investment grew, I became uncomfortable and let her know that any  
4 additional "finders fee" should be used for a philanthropic project. We discussed the  
5 possibility of something we were both passionate about, a sanctuary for wild horses that  
6 would otherwise be sold for their meat.

7 27. Taylor's statements that I "stole" from her, "took a secret kickback," or defrauded her in  
8 connection with her cryptocurrency are false. I never stole from Taylor, never secretly  
9 profited from her investments, and never entered into any arrangement with the intent to  
10 deceive or deprive her of money. At no time did I understand or treat those tokens as a  
11 personal, secret payment for myself in the way Taylor now implies.

12 28. At the end of the one year vesting period, in the summer of 2022 after the crypto markets  
13 had collapsed, the tokens had lost almost all of their value. At no time were the tokens  
14 converted into realized income, and they never used for my personal benefit. They did  
15 not result in me receiving usable money. They were not a secretly pocketed "fee" like the  
16 MSJ suggests.

17 29. From the time we began discussing blockchain-based philanthropy and social-impact  
18 projects, Taylor and I talked multiple times about the possibility that certain token  
19 allocations might be set aside for charitable initiatives, collaborative projects, or future  
20 development. Any suggestion that I was secretly hiding assets from her is completely  
21 inconsistent with the nature of those conversations and with how I actually behaved.

22 30. I did not negotiate, demand, or receive any cash, wire transfer, or realized monetary  
23 "finder's fee" for myself in connection with this transaction or any other transaction for  
24 Taylor. My role was to help implement what Taylor wanted, not to secretly extract  
25 personal profit.

26 31. When I later prepared a summary of Taylor's crypto holdings in July 2022, I did so at her  
27 request and under significant time pressure. That summary was not a forensic accounting  
28 of every wallet or theoretical token allocation. It was never intended to be a **full audit of  
all purchases made to date**, and did not reflect every technical aspect of every project. It  
reflected the categories and assets Taylor asked me to prioritize. It was not an effort to  
hide anything.

32. At no point did I intentionally or knowingly conceal a real, realized "finder's fee" from  
Taylor, because I did not receive a secret, realized finder's fee in the first place. Her  
characterization of this as a hidden kickback is false.

33. Likewise, the generalized allegation that I "stole" from her or "took her money" is false.  
Any losses that occurred in her portfolio were the result of market conditions, the  
extreme volatility of cryptocurrency, and aggressive strategies Taylor herself pushed  
for—not because I misappropriated funds or secretly took money.

**Taylor initiated, approved, and directed many of the trading activities now labeled  
“unauthorized”**

34. From 2021 through early 2022, Taylor was an active, driving force behind her own cryptocurrency strategy. She was not a passive, uninformed investor. She was extremely involved, watched the markets closely, and constantly pushed for larger positions and more exposure to certain projects.

35. Taylor frequently contacted me at all hours—by text, phone calls, and voice notes—telling me to “buy now,” “get in before it moves,” or “we need more of this.” Many of the trades now described in the MSJ as “unauthorized” were the direct result of Taylor’s urgency, instructions, and explicit desire to maximize positions.

36. In numerous conversations, Taylor made it clear that she wanted me to move quickly and to exercise initiative in executing trades where timing was critical. She repeatedly told me that she trusted me to “handle it” and wanted me to act fast so she did not “miss the move.”

37. When I raised concerns about risk, position size, or the magnitude of her exposure—especially with respect to Persistence/XPRT and certain other altcoins—Taylor either minimized those concerns or framed my hesitation as a reflection of my “poverty mentality” and lack of vision. She made it emotionally difficult for me to slow things down or refuse.

38. Even after her financial manager, Leigh **Wang**, became more formally involved, Taylor continued reaching out to me directly for insight, updates, and informal assistance. The transition of formal responsibility was not experienced by me as a clean, abrupt cutoff at the time; it evolved while Taylor’s expectations of me remained high.

39. I never viewed myself as having independent authority over Taylor’s assets in the way a financial professional or fiduciary would. I saw myself as someone who was trying to keep up with Taylor’s demands and protect her positions in a chaotic market, while under immense emotional pressure and fear of her reaction.

**My reputation was severely damaged by Taylor’s statements**

40. Before Taylor began accusing me of fraud and theft, I had an established, if fragile, career in digital media, development, and consulting. I had a reputation for being creative, resourceful, and trustworthy. I was actively nurturing relationships and projects in film, television, tech, and crypto.

1 41. After Taylor made defamatory statements about me to people in our shared social and  
2 professional circles, my relationships and opportunities collapsed in a way that was  
3 sudden, coordinated, and unlike anything I had experienced before.

4 42. As described above, Catherine Hardwicke—a respected director I had worked with and  
5 deeply respected—pulled away from me and later confirmed that Taylor had told her I  
6 had taken a secret kickback and essentially stolen from Taylor. That one conversation  
7 alone sent a clear signal that Taylor’s accusations had reached high-level industry  
8 contacts.

9 43. At the same time, key relationships in the entertainment and tech communities abruptly  
10 shifted. People I had worked with for years in development, digital strategy, and content  
11 packaging stopped responding to emails, ceased including me in group texts and project  
12 threads, and let previously active projects go completely silent. This included ongoing  
13 conversations about potential series development, digital media collaborations, and  
14 advisory roles with emerging platforms—the exact type of work I had done for years and  
15 relied on for future income. In several instances, people explicitly referenced my  
16 “situation with Taylor” or said they had “heard things” about what I had done with her  
17 money and “needed to be careful” or “couldn’t get in the middle of that.” In others, the  
18 timing was unmistakable: communications and opportunities that had been warm and  
19 active before Ms. Thomson’s accusations simply vanished immediately afterwards, in the  
20 same tight window when my small COVID-era social and professional circle cut off  
21 contact. This included people like director Catherine Hardwicke, with whom I had  
22 ongoing creative and professional discussions before Ms. Thomson told her I had taken a  
23 ‘secret kickback.’ After that, our communication and any potential work together ceased  
24 completely.

25 44. Before Ms. Thomson began telling people that I had “stolen from her” or taken a “secret  
26 kickback,” I was actively developing multiple paid consulting and development projects  
27 in the entertainment and tech space. These included work as a creative/development  
28 consultant on scripted and unscripted series, digital strategy and audience growth  
consulting for production companies and creators, and pitch and deck development for  
early-stage media/tech ventures. Several of these projects were in the low- to mid-six-  
figure range if they moved forward to production or full engagement. After Ms. Thomson  
began spreading accusations that I had committed fraud with her money, those same  
people told me—sometimes directly, sometimes through intermediaries—that they were  
“concerned,” “needed to step back for now,” or “couldn’t risk being associated with  
someone being accused of defrauding a wealthy client.” As a result, those consulting and  
development opportunities stalled or disappeared entirely. These reputational injuries did  
not appear randomly, nor were they explained solely by COVID-19 or general industry

1 downturns. They were timed with and directly tied to Taylor's accusations. When  
2 someone of Taylor's wealth and status tells people that you stole from her, that label  
sticks.

3 45. I estimate that I lost hundreds of thousands of dollars in potential income from  
4 consulting, development, and collaboration opportunities that either evaporated or were  
5 never offered because people believed Taylor's version—that I was a thief who harmed  
one of the wealthiest women in the world

6 46. These reputational and financial harms began before the public filings in this case were  
7 widely known, which further confirms that Taylor's damaging statements were being  
circulated privately and informally, not just contained within privileged legal documents.  
8

9 **The sudden collapse of my social circle was directly tied to Taylor's accusations**

10 47. During the COVID-19 pandemic and in the years immediately surrounding it, my world  
11 became very small. Like most people, I was physically isolated, and my social and  
12 emotional life centered almost entirely around a small, tight-knit circle that included  
13 Taylor, her daughter Madeleine, Ron Murphy, Catherine Hardwicke, Kevin Fitzgerald,  
and a few mutual friends. These people were not casual acquaintances; they were my  
14 primary community, my support system, and in many ways my surrogate family.

15 48. Throughout this period, I communicated with members of this circle constantly. I spoke  
16 with Madeleine nearly every day by text and voice message. Ron and I exchanged  
17 frequent messages that reflected a close friendship and mutual reliance. I intend to submit  
18 representative text message threads with Ron Murphy and Madeleine Thomson as  
exhibits to this declaration, which accurately reflect the emotional closeness and day-to-  
day nature of these relationships before things changed.

19 49. [Ron – directly contradicting Taylor's "not a friend" narrative] In her deposition and  
20 Motion for Summary Judgment, Taylor attempts to minimize or erase my connection to  
21 Ron Murphy by suggesting he was not really my friend. That portrayal is inconsistent  
22 with reality. The messages between Ron and me show an ongoing, personal, and  
emotionally intimate friendship in which we shared plans, worries, and mutual support.  
23 He was someone I trusted and relied on—especially during the pandemic when in-person  
social contact was limited.

24 50. There was no conflict or falling-out between Ron and me before Taylor's accusations  
25 about me began. We had not had any argument, financial dispute, or personal rupture.  
From my perspective, our friendship was active and intact—until, very abruptly, it was  
not.

26 51. [Madeleine – explicit "because of what you did to my mother"] My relationship with  
27 Taylor's daughter, Madeleine, was similarly close. For years, we spoke constantly. She

1 confided in me, and I was deeply involved in her life and emotional world. Our messages  
2 reflect that we communicated almost daily and that she saw me as a trusted, stable  
presence.

3 52. After the crypto market crash and after Taylor began accusing me of fraud and theft,  
4 Madeleine suddenly stopped speaking to me. When I reached out to ask what was  
5 happening, Madeleine made it clear—in substance—that she was not speaking to me  
6 “because of what [I] did to [her] mother.” That statement from Madeleine is significant:  
7 she did not say she was stepping back for her own reasons or because of anything I had  
done directly to her; she explicitly framed it as a reaction to what she believed I had done  
to Taylor.

8  
9 53. I never lied to Madeleine about Taylor’s finances, never took money from Madeleine,  
and never betrayed her trust. Her choice to cut me off was plainly driven by the narrative  
10 she had received about me from Taylor—that I had somehow harmed or defrauded her  
mother.

11 54. [Abrupt, coordinated cut-off across the circle] Around the same time Madeleine stopped  
12 speaking to me, Ron Murphy also entirely withdrew. He stopped responding to messages  
and invitations without explanation, despite our prior closeness. Catherine Hardwicke—  
13 with whom I had an ongoing professional and personal relationship—likewise abruptly  
14 stopped responding and engaging. Kevin Fitzgerald and other mutual friends also fell  
15 silent or distanced themselves.

16 55. None of these people gave me a neutral, organic explanation, such as a personal conflict  
between us, a scheduling issue, or a gradual drift. The change was sudden, coordinated,  
17 and aligned in time with Taylor’s shift from friend to accuser—when she began telling  
people (as I later learned from Catherine and others) that I had taken a secret kickback,  
18 stolen from her, or committed fraud with her cryptocurrency.

19 56. During this period, there was no other event in my life that could plausibly explain why  
this entire social circle, almost all of whom were closely tied to Taylor, would  
20 simultaneously cut me off. There was no scandal involving me independent of Taylor, no  
personal attack I had made on them, and no pattern of behavior that would cause all of  
21 them, at once, to disappear from my life.

22 57. [Catherine – direct confirmation of Taylor’s statements] As I described in another section  
23 of my declaration, when I finally reached out to Catherine Hardwicke after many months  
of silence, she told me that Taylor had said I had taken a “secret kickback” and had  
24 effectively stolen from her in the Persistence/XPRT deal and other crypto activity. That  
25 conversation confirmed that Taylor was giving a specific, defamatory narrative about me  
26 to at least one key person in this circle.



1 58. Catherine’s explanation was consistent with what I had already begun to observe: people  
2 who had been close to me and to Taylor were now treating me as if I had done something  
3 deeply wrong with Taylor’s money. They were not merely “busy” or drifting away—they  
4 were acting as if I had crossed a moral line.

5 59. [Michele’s corroboration + Taylor’s pattern] The declaration of Michele Fleury, my  
6 partner of nearly fourteen years, independently corroborates what I experienced. Michele  
7 states that she “watched [my] social circle evaporate after Taylor began speaking  
8 negatively about [me],” and that once Taylor turned on me, “all [my] closest friends  
9 followed suit.” That is exactly what it felt like from the inside. Michele also describes  
10 Taylor’s long-standing pattern of turning on people and then speaking poorly about  
11 them—friends, staff, romantic partners, and even her daughter’s boyfriends—once she  
12 decided they had wronged her.

13 60. Given this documented pattern, the timing of the mass withdrawal, and Catherine’s direct  
14 report of what Taylor told her, I do not believe it is a coincidence that every member of  
15 my core circle connected to Taylor—including her own daughter—cut me off right after  
16 Taylor began portraying me as a thief and fraudster.

17 61. [Impact + reasonable inference] During the pandemic, these were essentially the only  
18 people I had. When they all disappeared—without any direct wrongdoing by me toward  
19 them—it felt like being exiled from my entire world. I lost not just friends but emotional  
20 anchors, creative collaborators, and the small community that had made an extremely  
21 isolated time bearable.

22 62. The impact on my mental and emotional health was severe. I went from feeling  
23 embedded in a small but meaningful community to feeling completely shunned and  
24 alone. I experienced this as a form of social and professional death—caused not by any  
25 independent misconduct on my part, but by Taylor’s decision to recast me as someone  
26 who had betrayed and defrauded her.

27 63. Based on (a) the close, documented nature of these relationships before the market crash  
28 and Taylor’s accusations, (b) the abrupt and simultaneous severance of contact afterward,  
29 (c) the explicit statement from Madeleine that she stopped speaking to me “because of  
30 what [I] did to [her] mother,” (d) Catherine’s direct report of Taylor’s statements about a  
31 “secret kickback” and theft, and (e) Taylor’s well-documented pattern of turning on  
32 people and then speaking negatively about them, I firmly believe—and submit—that my  
33 social circle did not “just evaporate.” They withdrew because of what Taylor told them  
34 about me.

35 64. The loss of this circle, in the unique context of the pandemic and my already-fragile  
36 circumstances, was a major component of the emotional and reputational harm I suffered  
37 as a direct and foreseeable result of Taylor’s defamatory statements about me.

1 **The collapse of my social circle occurred in early 2022 — more than a year before any**  
2 **lawsuit existed, and aligned directly with Taylor’s private accusations of fraud and theft**

3  
4 65. One of the most critical facts in understanding my injury is timing. My social circle did  
5 not collapse after the lawsuit was filed in 2023, nor as a result of public allegations. The  
6 collapse happened rapidly and abruptly in the spring of 2022, more than a year before any  
7 legal action existed. At that time, nothing about Taylor’s accusations had been stated in  
8 court filings, in the press, or through any public channel. The only way people could have  
9 believed that I had stolen from her or committed fraud was if Taylor privately told them  
10 so.

11 66. My daily communications with Madeleine, my extremely close relationship with Ron  
12 Murphy, and my consistent professional connection with Catherine Hardwicke—all of  
13 which were active through late 2021—shifted suddenly and without warning between  
14 February and May of 2022. This aligns precisely with the period when the market  
15 crashed, Taylor became angry about her investment losses, and she began making  
16 statements to others accusing me of wrongdoing.

17 67. For example, Madeleine, who had spoken to me nearly every day for years, abruptly cut  
18 contact in 2022. When I reached out to ask what had happened, she made it clear that she  
19 was distancing herself because of what she believed I had “done to her mother.” This  
20 occurred well over a year before Taylor filed her lawsuit. Her statement directly ties her  
21 severing contact to the allegations Taylor shared with her privately.

22 68. Ron Murphy, another close friend, likewise disappeared from my life during this exact  
23 window. We had no conflict, no falling out, no disagreement. The withdrawal occurred  
24 *only* after Taylor began framing me as having stolen from her. The timing is  
25 unmistakable, and I will attach messages from my prior friendship with Ron that  
26 contradict Taylor’s assertion that he was not my friend.

27 69. Catherine Hardwicke, with whom I had active creative collaboration, also stopped  
28 communicating during this same period. When I later reached out, Catherine confirmed  
that Taylor had told her I had taken a secret kickback and stolen from her. Catherine’s  
explanation tied her withdrawal directly to statements Taylor made about me *long before*  
any lawsuit existed or any litigation privilege could apply.

70. These events did not occur in 2023 or 2024. They happened in early 2022, immediately  
after Taylor began privately accusing me of misconduct. Taylor’s MSJ attempts to  
characterize my defamation claim as being based solely on statements made “in  
connection with litigation.” That is demonstrably false. My reputational collapse occurred  
nearly 18 months before the complaint was filed, and it happened because of

unprivileged, extrajudicial statements made by Taylor to people in our shared social and professional circles.

71. The fact that this mass severance occurred before any public allegation makes it impossible for the cause to have been the lawsuit or any litigation-related statements. There was one common denominator: Taylor's accusations. As someone known for turning on people swiftly and speaking harshly about them afterward, Taylor exercised extraordinary influence over this small social ecosystem. When she turned on me, every person within her orbit followed.
72. In the isolated, emotionally fragile circumstances of the COVID-19 era, losing my entire support system in this way was devastating. These were the people I relied on. They did not drift away gradually. They vanished all at once—after Taylor's accusations but long before any legal claim or privileged statement existed.
73. Based on the timing, the consistency of the reactions, the statement from Madeleine, the confirmation from Catherine, and Michele's direct observations, there is no reasonable explanation for this sudden, coordinated withdrawal except that Taylor told each of these individuals that I had stolen from her or defrauded her. The harm I experienced was the direct, proximate result of those statements.

#### **INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS – SWORN FACTUAL STATEMENTS**

##### **Taylor's extreme and reckless conduct toward me**

74. Over the course of more than a decade, Taylor engaged in a pattern of extreme, demeaning, and dehumanizing conduct toward staff, friends, and family members that I personally witnessed and that directly shaped my relationship with her. I watched her routinely accuse employees and trusted aides of "theft," "fraud," "incompetence," or "extreme negligence" over minor issues, scream at them in front of others, and then abruptly terminate them while spreading damaging stories about their character. Examples included housekeepers such as Raquel and Dora, who were labeled "thieves" over routine job-related conduct like submitting overtime or sending sheets to be professionally laundered; a long-time nanny, Yas, who was fired and repeatedly accused of grand theft and drug abuse; and other staff such as Shannon and Justin, who were called "bitch," "cunt," "liar," "useless," and blamed for "costing her millions" simply for following her instructions.

75. I also became aware, through Taylor's own statements and communications, that she had a history of illegal or covert surveillance of staff, including wiretapping phones and using hidden cameras and audio devices to monitor employees without their knowledge or

1 consent. She bragged about gathering information through undisclosed surveillance and  
2 then using it to fire staff or accuse them of wrongdoing while carefully avoiding putting  
3 the real reason in writing so she would not expose the illegal methods by which the  
4 information was obtained. This reinforced my understanding that Taylor had both the  
willingness and the tools to destroy people if she decided they had displeased her.

5 76. By the time Taylor's cryptocurrency demands escalated in 2021, I had already witnessed  
6 more than a decade of this pattern: idealize people, use them intensely, then turn on them  
7 with extreme hostility, public accusations, and social banishment. Because I had seen her  
8 do this repeatedly to staff and friends—including people as close to her as her daughter's  
9 boyfriends and our mutual friend Ron Murphy—I understood that if she ever decided to  
10 "turn" on me, the consequences to my life, reputation, and mental health would be  
11 catastrophic. That awareness was a constant source of fear and hypervigilance for me,  
and Taylor knew it because I spoke with her many times about how frightening it was to  
see her talk about others that way.

12 77. In 2021, Taylor placed me in sole physical custody of cryptocurrency assets worth up to  
13 approximately Two Hundred Million (\$200,000,000) at the height of the market. These  
14 assets were stored in my personal home, not in an institutional or insured custodial  
15 environment. I repeatedly told her that this terrified me, and that if anyone became aware  
16 that those funds were under my control, I could be in serious physical danger. Her  
17 response was not to reduce the risk or move the assets; instead she told me that no one  
18 would ever suspect I had that much crypto because I was "so poor," and, in a  
19 conversation I will never forget, she smiled and asked me if I "**would be willing to take**  
20 **a bullet**" if armed intruders came to take her crypto. I was so psychologically  
21 conditioned and desperate to stay in her good graces that I said "yes," and then tried to  
22 explain that my greatest fear was for my partner and our dogs. She looked visibly  
23 disappointed that I would hesitate to sacrifice them. That conversation was one of the  
24 most disturbing experiences of my life and made it absolutely clear that Taylor regarded  
25 my safety—and the safety of the people and animals I loved—as expendable.

26 78. At Taylor's insistence, I executed a relentless volume of high-risk, high-value  
27 cryptocurrency transactions that regularly exceeded \$10,000,000 at a time in extremely  
28 illiquid, low-cap coins. Because of the size of her orders, I had to place thousands of  
small-laddered orders, sometimes every twenty minutes for days, in order not to blow out  
the market. I repeatedly told her I had no formal financial training, was learning in real  
time, and that I was not a financial advisor. I also told her that the amounts she was  
pushing into particular coins—especially Persistence—were far too high and that the

1 risks were extreme. She dismissed my concerns, told me this was just my “poverty  
2 mentality,” and said that was why I would “always be poor.” The combination of huge  
3 financial stakes, total lack of institutional infrastructure, and her contemptuous response  
4 to my fear created unbearable psychological pressure that she knew I was experiencing  
and chose to escalate instead of relieving.

5 79. Taylor used her immense wealth and social power to keep me locked in this role. She  
6 made clear she did not want her family or formal advisors fully aware of the scale of her  
7 speculative purchases and therefore relied on me as an off-books operator. When her  
8 head of investments and her accountant later began demanding detailed records, I was  
9 blamed for not having audit-grade spreadsheets for thousands of tiny trades that no one  
10 had ever told me I needed to track in that way. At the same time, Taylor continued to  
11 disparage her own advisors—calling Leigh useless and accusing him of costing her  
“hundreds of millions”—so I was acutely aware that if she decided she had “lost” money,  
she would look for someone to scapegoat. That someone was me.

12 80. The environment Taylor created around me was one of constant crisis, fear, and  
13 emotional volatility. She called and messaged at all hours of the day and night demanding  
14 immediate purchases, transfers, or research, often while berating staff or complaining that  
15 everyone around her was incompetent or out to take advantage of her. I often worked  
16 twenty-hour days solely to keep up with her demands while turning down paid work in  
17 the film, television, and marketing industries because I no longer had the time or mental  
18 capacity to do anything else. Taylor was fully aware of this; I told her directly that her  
demands were causing me to lose other employment opportunities, yet she never offered  
to scale back, compensate me, or move the work to a professional team.

19 81. When the crypto market crashed in late 2021 and 2022, Taylor’s behavior toward me  
20 shifted from controlling and demanding to hostile and accusatory. Despite the fact that  
21 every major allocation decision had been hers’, and despite my repeated warnings about  
22 risk, she began to blame me for her losses in the same way I had watched her rewrite  
23 history and blame staff for her own choices for more than a decade. She involved her  
24 staff and advisors in pressuring me for records I did not have, while withdrawing  
personally and socially in a way that left me isolated, terrified, and certain that I would be  
the next person she destroyed to avoid facing her own role in what had happened.

25 82. Taylor then escalated her conduct from private blame-shifting to public, reputation-  
26 destroying accusations. Beginning in approximately November 2021 and continuing for  
27 years before any lawsuit was filed, multiple individuals from our small COVID-era social



1 circle and professional network separately reported to me that Taylor was telling people I  
2 had “stolen from her,” “taken a secret kickback,” “defrauded” her, “always had a plan,”  
3 and was a “grifter” and “cunt.” Shortly thereafter, long-standing relationships with people  
4 like her daughter Madeleine, our close friend Ron Murphy, and director Catherine  
5 Hardwicke abruptly ended with no explanation other than that they were no longer  
6 speaking to me “because of what [I] did to [their] mother.” The timing of this social  
collapse exactly tracked the period when I am informed and believe Taylor was spreading  
these accusations—not the later filing of her lawsuit in 2023.

7  
83. Because this all happened during the COVID pandemic, when my world had already  
9 shrunk to a very small circle of people, losing that circle overnight was emotionally  
10 shattering. These were the people I ate with, spoke to daily, and relied on for community.  
11 It is not credible that an entire group of mutual friends—people who had been woven into  
12 my life for years—would spontaneously and simultaneously sever all contact absent  
13 some precipitating event or narrative. Based on what I was directly told, Taylor’s long-  
standing pattern of turning on people and rewriting history, and the precise alignment in  
timing, I am informed and believe that this severance of connection was directly caused  
by Taylor telling them that I had defrauded and stolen from her.

14  
84. After isolating me socially and destroying my reputation in our shared communities,  
15 Taylor filed this lawsuit accusing me of fraud and theft and has prosecuted it aggressively  
16 while knowing that I could not afford counsel and would be forced to defend myself pro  
17 se against a multi-billionaire with unlimited legal and litigation resources. She was aware  
18 of my existing health conditions, my financial precarity, and the fact that the legal costs  
19 alone could ruin me, yet she proceeded anyway, doubling down on accusations she  
20 knew—or at a minimum recklessly disregarded—were false or grossly incomplete. The  
lawsuit became an extension and amplification of the same pattern of character  
assassination, scapegoating, and exploitation I had witnessed her direct at others for  
years, now focused entirely on me.

21  
22 **The emotional and physical impact on me**

23  
85. The cumulative effect of Taylor’s conduct—placing me in sole custody of massive  
24 volatile assets; subjecting me to constant high-stakes demands; threatening my physical  
25 safety; destroying my reputation and social circle; and then filing a public lawsuit  
26 accusing me of criminal conduct—caused a profound and cascading collapse of my  
27 mental and physical health. In October 2021, at the height of the trading she demanded, I  
developed sudden, severe insomnia, Postural Orthostatic Tachycardia Syndrome (POTS),  
and mitral valve prolapse, diagnoses confirmed by specialists at Cedars-Sinai. These



1 conditions were accompanied by panic attacks, vertigo, near-fainting episodes, heart  
2 palpitations, and an inability to rest or recover. Prior to this period, I had never  
3 experienced anything like this.

4 86. At the same time, my pre-existing conditions—including diverticulitis and Ehlers-Danlos  
5 Syndrome—flared severely. I required emergency care for diverticulitis in October 2021  
6 and March 2022 and was later hospitalized for a perforated colon in June 2023 and a  
7 colon abscess in August 2025. My Ehlers-Danlos symptoms worsened significantly,  
8 leaving me in chronic pain and with reduced functional capacity. These physical crises  
9 coincided directly with the period of Taylor’s most extreme demands, the market  
10 collapse, and the escalation of her accusations against me.

11 87. The psychological impact was even more devastating. By early 2022 I was experiencing  
12 clinical depression, severe anxiety, and suicidal thoughts for the first time in my life. I  
13 developed Complex Post-Traumatic Stress Disorder (CPTSD) as a result of months and  
14 then years of extreme pressure, sleep deprivation, reputational destruction, and the  
15 constant threat of being blamed and cast out by someone I knew had the power to ruin  
16 people. I became hypervigilant, unable to trust others, emotionally dysregulated, and  
17 often paralyzed by fear. At times I could not function in basic daily tasks, let alone pursue  
18 a career or earn a living.

19 88. The lawsuit and the continuation of Taylor’s accusations made the emotional distress  
20 permanent and inescapable. I have spent countless hours trying to respond to filings I  
21 cannot afford a lawyer to handle, while knowing that Taylor’s resources appear limitless.  
22 I lost my ability to work in the industries where I had built my career, was effectively  
23 rendered “radioactive” in certain networks, and now live with the ongoing reality that my  
24 name has been associated with fraud and theft by one of the wealthiest women in the  
25 world. The stress of this has, at times, driven me to the brink of complete emotional  
26 collapse, including a relapse after two years of sobriety when the combined weight of the  
27 breakup with my partner, my financial collapse, and Taylor’s legal attacks became  
28 unbearable.

29 89. Before Taylor’s conduct escalated, I was a confident, creative, highly functional person  
30 with a career, a social network, and a clear sense of direction. As a direct and foreseeable  
31 result of her actions, I became someone emotionally devastated, chronically  
32 overwhelmed, physically compromised, socially exiled, and financially ruined. The  
33 change in my life is not subtle or speculative; it is radical, obvious, and has been  
34 witnessed by multiple people close to me, including my former partner, Michele. In my

1 view, no reasonable person could look at the full pattern of Taylor's conduct and  
2 conclude that this level of harm was anything other than the predictable, indeed  
3 inevitable, outcome of how she chose to treat me.

4 **Taylor's conduct toward me was extreme, shocking, and caused severe**  
5 **emotional harm**

6 90. Taylor was not just a former client or investor; she was someone I considered a close  
7 friend for over a decade. I admired her, trusted her, and oriented huge portions of my life  
8 around being available to her. For someone in that position to suddenly accuse me of  
9 criminal behavior—knowing those accusations would spread through my small  
10 professional world—was emotionally devastating.

11 91. Taylor used her enormous wealth, status, and influence to reframe me from a loyal friend  
12 and helper into a "fraudster" and "thief." She did this knowing that people around her  
13 would believe her, and that I had no comparable resources to defend myself or correct the  
14 narrative.

15 92. The reversal from being included, praised, and trusted to being painted as a criminal and  
16 shut out of our mutual community was shocking, disorienting, and traumatic. It did not  
17 feel like an ordinary friendship falling out; it felt like a public execution of my character.

18 93. When Taylor filed this lawsuit accusing me of fraud and theft, she knew I had no money  
19 to hire counsel, that I was already struggling financially and emotionally, and that  
20 defending myself against her and her legal team would consume my life. She proceeded  
21 anyway, while simultaneously spreading her version of events to people who mattered to  
22 my career and sense of belonging.

23 94. As a direct result of Taylor's false accusations, I have experienced intense emotional  
24 suffering: panic attacks, insomnia, depression, severe anxiety, and episodes of suicidal  
25 ideation. I often woke up with my heart racing, unable to breathe, and terrified of what  
26 would happen next—financially, legally, and socially.

27 95. My relapse on October 12, 2024, after two years of sobriety, was not random. It occurred  
28 in the context of the relentless pressure of this lawsuit, the collapse of my financial life,  
the breakdown of my relationship, and the feeling that Taylor had completely destroyed

1 my reputation and future. I was in overwhelming emotional pain that I directly associate  
2 with Taylor's actions.

3  
4 **The extreme power imbalance magnified the harm and removed my ability  
to protect myself**

5 96. Taylor is one of the wealthiest women in the world, with immense financial, social, and  
6 legal resources. I am not. That imbalance shaped every aspect of our relationship and the  
7 fallout.

8 97. During the years I worked with her on cryptocurrency, I felt that I could not safely set  
9 boundaries, slow her down, or disengage, because I believed that if Taylor turned on  
10 me—as she had turned on others—it would destroy my reputation and community.  
11 Unfortunately, that is exactly what occurred.

12 98. Taylor knew I depended heavily on my reputation and personal relationships to generate  
13 work and income. She also knew I had no safety net, little stability, and fragile mental  
14 health after years of compounded trauma. She nonetheless chose to characterize me as a  
15 thief and fraudster to people whose opinions had enormous weight in my personal and  
16 professional life.

17 99. When a person with Taylor's level of power, money, and status tells mutual friends,  
18 colleagues, and industry contacts that you stole from her, the harm is not theoretical. It is  
19 immediate and catastrophic. I experienced that firsthand.

20 **Taylor's statements and conduct foreseeably caused—and did cause—severe  
21 emotional distress**

22 100. Accusations of fraud and theft go to the core of a person's integrity. Taylor knew,  
23 or at minimum recklessly disregarded, the likelihood that accusing me of these things  
24 would cause severe emotional distress. She knew that my entire career depended on being  
25 perceived as trustworthy.

26 101. Following her accusations, I watched my support network disappear, my career  
27 prospects collapse, and my sense of self shatter. The people who had once seen me as  
28 talented and trustworthy began to treat me as radioactive. That transition was emotionally  
excruciating.

1 102. I developed chronic anxiety, experienced frequent panic attacks, and struggled  
2 with deep depression. There were extended periods where I could not function normally,  
3 where even basic tasks felt impossible. I lived with a constant fear that my life was  
4 effectively over and that I would never recover my reputation.

5 103. These symptoms were not transient or minor. They were severe, long-lasting, and  
6 profoundly disruptive to my daily life, relationships, and ability to work.

7 **CAUSATION & DAMAGES**

8 104. I lost concrete professional opportunities, creative collaborations, and consulting  
9 work because Taylor accused me of fraud and theft. People who had previously  
10 expressed interest in working with me either cut off contact, cancelled plans, or quietly  
11 moved on after learning of Taylor's allegations.

12 105. My career trajectory, which already had been shaken by the pandemic, was  
13 effectively obliterated by Taylor's conduct. There is a significant difference between  
14 industry-wide disruption and being individually branded as a thief by an ultra-wealthy,  
15 highly connected person. The latter is what happened to me.

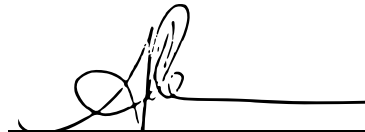
16 106. I suffered severe emotional and psychological harm as a direct result of Taylor's  
17 statements and the way she weaponized her resources against me. The panic, insomnia,  
18 profound anxiety, relapse, and trauma symptoms I experienced are not abstract—they are  
19 the real consequences of what she did.

20 107. Taylor's narrative in her Motion for Summary Judgment—that she was simply a  
21 generous friend and I alone am responsible for what happened—is incomplete and false.  
22 It omits the reality of her accusations, her power, and the devastating impact her conduct  
23 has had on my life.

24 108. My life, career, mental health, and reputation have been severely and enduringly  
25 damaged by Taylor's false statements, by Taylor's abuse (as set forth hereinabove) and  
26 by the extreme, outrageous, and malicious way she chose to handle the fallout from her  
27 own investment decisions.

28 Respectfully submitted,  
Ashley Richardson, In Pro Per

1 Dated December 10, 2025.

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3 \_\_\_\_\_  
4 ASHLEY RICHARDSON  
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28 DECLARATION OF ASHLEY RICHARDSON IN SUPPORT OF DEFENDANT/COUNTERCLAIMANT  
ASHLEY RICHARDSON'S OPPOSITION TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY  
JUDGEMENT -

21

# EXHIBIT A



Page 1

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

TAYLOR THOMSON,	)	
	)	
Plaintiff and Counterclaim	)	
Defendant,	)	
	)	
vs.	)	No. 2:23-cv-04669-
	)	MEMF-MAR
ASHLEY RICHARDSON,	)	
	)	
Defendant and Counterclaim	)	
Plaintiff.	)	
-----	)	

VIDEO-RECORDED DEPOSITION OF TAYLOR THOMSON  
taken at 2029 Century Park East, Suite 1520,  
Los Angeles, California, at 10:31 a.m. Pacific  
Time, Friday, November 7, 2025, before Theresa  
JoAnn Phillips-Blackwell, CSR 12700.

1 APPEARANCES OF COUNSEL:

2

3 For Plaintiff:

4

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(Appearing in Person)

5

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-and-

8

JULIAN ANDRE, ESQ.

9

(Appearing in Person)

JOSH YIM, ESQ.

10

(Appearing via Zoom)

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21

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ashrichardson@mac.com

24

Also Present: Keith Farris, videographer

Joseph Tafolla

25

(Both Appearing in Person)

Page 3

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I N D E X

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DEPONENT

EXAMINED BY

PAGE

4

Taylor Thomson

Ms. Richardson

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EXHIBITS

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(NONE MARKED)

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Page 4

1 (Los Angeles, California; Friday, November 7, 2025,  
2 10:31 a.m. Pacific Time)

3  
4 THE VIDEOGRAPHER: Good morning. We are now on  
5 the record. This begins the video-recorded deposition  
6 of Ms. Taylor Thomson in the matter of Taylor Thomson  
7 versus Ashley Richardson. Today's date is November 7th,  
8 2025. The time is 10:31 a.m. This deposition is being  
9 taken at the law firm Boies Schiller at 2029 Century  
10 Park East in Los Angeles, California.

11 My name is Keith Farris, the legal videographer  
12 and notary, of Magna Legal Services. The certified  
13 court reporter today is Ms. Theresa Phillips-Blackwell  
14 of Magna Legal Services.

15 Will all counsel now please introduce  
16 yourselves and state whom you represent.

17 MR. HARRISON: You're first.

18 MS. RICHARDSON: Yes. My name is Ashley  
19 Richardson. Good morning. I am the defendant and  
20 counterclaim plaintiff, appearing today in pro per.

21 MR. HARRISON: Todd Harrison for McDermott Will  
22 & Schulte for Ms. Thomson. With me is my colleague,  
23 Julian Andre. And on Zoom, not present in the room  
24 right now is Campbell Herbert, also with McDermott Will  
25 & Schulte. And we may -- oh, actually, Josh Yim,

1 another associate, is also on Zoom.

2 THE VIDEOGRAPHER: Thank you. Will the court  
3 reporter now please swear in the witness.

4 DEPOSITION OFFICER: Hello, everyone. My name  
5 is Theresa Phillips-Blackwell. I'm a California  
6 certified shorthand reporter, CSR No. 12700.

7 Raise your right hand, please.

8 You do solemnly state that the evidence you  
9 shall give in this matter shall be the truth, the whole  
10 truth, and nothing but the truth?

11 THE WITNESS: I swear.

12 DEPOSITION OFFICER: Thank you.

13 MR. RICHARDSON: Ashley, I would like to put  
14 something on the record.

15 MS. RICHARDSON: Sure. Yeah. Absolutely.

16 MR. HARRISON: So we sent you an email  
17 yesterday about the pending request that we have in for  
18 a confidentiality order. I didn't get a response.

19 Our suggestion, just for the record, was while  
20 the -- while we have a motion in for a confidentiality  
21 order -- I think you have some sort of request also into  
22 the Court for some sort of protective order. I'm not  
23 sure exactly what. But we have a motion in for a  
24 confidentiality order. It's a standard -- it's based on  
25 the standard Central District of California form

1 confidentiality order. We think it's going to get  
2 entered by the Court at some point.

3 Our suggestion in email yesterday was that  
4 we -- both parties agree to follow the confidentiality  
5 order until there's a court decision on it, which I  
6 anticipate will happen next week.

7 MS. RICHARDSON: I don't intend to, you know,  
8 disseminate the results of the deposition until that  
9 happens; and then we can deal with that at that time. I  
10 think, you know, appropriate -- anything that is -- is  
11 deemed improper at that -- at that -- at that time would  
12 be fine with me.

13 MR. HARRISON: Okay. So just so we're clear,  
14 our agreement is that the deposition -- the transcript  
15 of this deposition will not be disseminated beyond the  
16 parties until there is a court decision on the pending  
17 confidentiality order --

18 MS. RICHARDSON: Correct.

19 MR. HARRISON: -- request?

20 Great. Thank you very much.

21 MS. RICHARDSON: Yes.

22 MR. HARRISON: The other thing is we had sent  
23 in a -- we have a pending request for the Court to  
24 exclude certain areas of cross-examination at this  
25 deposition that the Court has not ruled on yet, and the



Page 7

1 application or the request was to have a informal  
2 discovery conference regarding certain categories of  
3 questions that we believe are not relevant and are  
4 intended to harass and intimidate Ms. Thomson.

5 So the Court hasn't ruled on that one either  
6 yet; and even though the Court hasn't ruled on that,  
7 we're still here today. We want to get the deposition  
8 in, get the deposition done; but we do -- you know, we  
9 have put you on notice that we think that certain  
10 categories are not relevant and we will consider to be  
11 harassing and intimidating if they get asked or asked in  
12 depth in any way. So I just want to put that on the  
13 record.

14 MS. RICHARDSON: I -- I --

15 MR. HARRISON: Hopefully, that's not an issue  
16 today.

17 MS. RICHARDSON: I appreciate it. I think  
18 we'll deal with it case by case. Obviously, there's a  
19 disagreement in terms of which elements are -- you  
20 consider to be harassing to you and which I consider to  
21 be relevant to the case.

22 So I would say again, you know, if the Court  
23 deems those improper, they can come off the transcript.  
24 And, you know, if things come to that point today and  
25 you request Ms. Thomson not to answer, I would say you

Page 8

1 do that at your own peril with the -- knowing that there  
2 could be a motion to compel to come back again. So I --  
3 I leave that to you.

4 You know, I don't think that -- I have, you  
5 know, despite everything, no intention of harassing or  
6 intimidating Ms. Thomson but -- but I also have a case  
7 that is separate from the case that she has against me,  
8 so they're two different cases, and they both have  
9 merits and -- and, you know, I -- I answered all of the  
10 questions that you proposed to me in my deposition; and  
11 respectfully, I'm hoping we can do the same today as  
12 much as possible.

13 And again, you know, if at any point we need to  
14 have a break and you want to discuss with me on the  
15 side, I'm happy to do that.

16 MR. HARRISON: Okay.

17 MS. RICHARDSON: But I just -- I just need to  
18 reserve rights to protect my own -- the merits of my own  
19 case as we go through this.

20 And, you know, if I do something, you know, at  
21 any point that is -- I will say this to you -- improper,  
22 just know I'm doing my best. I'm not an attorney. I  
23 have spent at this point thousands of hours trying to,  
24 you know, study how to be one on the side but -- but I  
25 will make mistakes, like, almost definitely.

Page 9

1           So, you know, I'm -- I am -- I'm happy to -- to  
2 do what is needed to -- to, you know, do the best --  
3 best of my ability. I have no interest in harassing or  
4 intimidating you. I -- I just want to go to the truth.

5           So that being said, this is an awkward life  
6 moment that neither of us ever thought we would have.

7           THE WITNESS: No.

8

9   EXAMINATION

10

11 BY MS. RICHARDSON:

12           Q. Here we are.

13           A. Okay.

14           Q. Okay. So, Ms. Thomson --

15           A. I look at the camera.

16           Q. That's okay.

17           Would you please state your full name for the  
18 record.

19           A. Taylor Lynne Thomson.

20           Q. And we swore in the witness already, so we've  
21 done that. Thank you for being here today. I know that  
22 this is not an easy thing to do, having just done it  
23 myself; and I just want to make sure you know you're  
24 under oath --

25           A. Yes.

Page 10

1 Q. -- and so all the questions that you're -- are  
2 asked to you under oath require you to be completely  
3 truthful to the best of your ability.

4 A. Understand.

5 Q. Okay. Great.

6 And then I just want to say -- this is a tricky  
7 one -- sometimes you might head nod, and for the  
8 record --

9 A. I'll be verbal.

10 Q. Great. That's it.

11 Will you please let me know if you don't  
12 understand a question as we go?

13 A. (No audible response.)

14 Q. Thank you.

15 And, Ms. Thomson, if you need to take a break  
16 at any time --

17 A. Okay.

18 Q. -- you just let me know.

19 A. Thank you.

20 Q. Okay. So that's a yes, you -- you will?

21 A. I got it.

22 Q. Okay. And the only thing I'm going to ask is  
23 that if you want to take a break, you wait until after  
24 you finish answering the question so if there's a  
25 pending question, you wait until it's over and then you

1 can --

2 A. Right.

3 Q. -- take a break at any time. Okay. Great.

4 MR. HARRISON: Can I just say, unless you have  
5 a question about a privilege issue.

6 THE WITNESS: Okay.

7 MS. RICHARDSON: That's a good point. Thank  
8 you.

9 BY MS. RICHARDSON:

10 Q. There are snacks. I -- they're kind of  
11 organicish; and then there is regular bad snacks; and  
12 there's water and there's coffee; so if you need  
13 anything, feel free.

14 Okay. So we'll start with, have you ever taken  
15 a deposition before?

16 A. Yes.

17 Q. You have. Okay.

18 Do you want to tell me what instances where you  
19 had to take a deposition -- what those cases were and  
20 approximately when.

21 A. The first one was over -- it was about 25 years  
22 ago.

23 Q. Okay.

24 A. It was -- it was a family court hearing, so --

25 Q. In Canada?

1 A. In Canada.

2 Q. Okay.

3 A. And that -- was several depositions there in  
4 the same -- same few cases. And then I -- I don't  
5 believe -- I should remember. I was in the high courts  
6 of England, but I don't believe there was a deposition  
7 that I recall. There was testimony, but I think it was  
8 straight to testimony. I'm sure -- I think I remember,  
9 but right.

10 Q. Yeah.

11 A. So really just 25 years ago or so --  
12 approximately. It was 2002.

13 Q. And that was a family estate matter?

14 A. No. It was my daughter.

15 Q. Oh. Oh, right.

16 A. Yeah. It was over my daughter.

17 Q. God, is she 25?

18 A. Yeah. It was over my daughter. So that was --  
19 that was actually 2002 through 2005. So there were a  
20 few in there. Since then, nothing.

21 Q. Okay. No other depositions?

22 A. No.

23 Q. Okay. Excellent.

24 A. Not that I recall.

25 Q. No.

1 A. I -- I imagine I would recall.

2 Q. And not in the United States, I assume?

3 A. No.

4 Q. And I probably --

5 A. Never.

6 Q. I would think they might be similar, but I  
7 don't know for sure.

8 So that being said, did you prepare for today's  
9 deposition?

10 A. Yes.

11 Q. Okay.

12 A. Yeah.

13 Q. And how did you prepare?

14 A. Well, I read the material as much as -- much of  
15 the material. I read much of the material, and then  
16 I -- I talked to my lawyers. And I pretty well read the  
17 material, and I talked to my lawyers.

18 Q. Did you talk to anybody other than your lawyers  
19 about the deposition?

20 A. No.

21 Q. No. Okay.

22 A. No.

23 Q. Now, are there any other names that you've gone  
24 by in the past?

25 A. Originally, in my youth I was born Lesley Lynne

Page 14

1 Thomson. But I never use Lesley, and I didn't like it,  
2 so I changed to Taylor. So it's Taylor Lynne now.

3 Q. Got it.

4 A. So just felt more appropriate.

5 Q. No other aliases --

6 A. No.

7 Q. -- or names that you went by?

8 A. No.

9 Q. And where were you born?

10 A. Toronto, Canada.

11 Q. Okay. And did you grow up in Toronto?

12 A. Predominantly, yes.

13 Q. Now, could you please state -- let's see --  
14 your -- so you said predominantly Toronto.

15 Where else did you live before you were 18?

16 A. Before I was 18 I lived -- we -- I lived in  
17 London.

18 Q. You did. Okay.

19 For more than a year?

20 A. About two and a half years.

21 Q. Got it.

22 So you started spending time London in your  
23 youth and --

24 A. At 17. At 17 I was in the States at  
25 university.



1 Q. I'm going to ask you what your educational  
2 background is.

3 A. My educational. I was at university. I did  
4 two and a half years there and studied languages, and  
5 then I went to the American Repertory Theater for a  
6 year. And then beyond that, I was just -- I've been  
7 given an honorary doctorate, so...

8 Q. That's amazing. Was that recent?

9 A. That was about 15, 20 years ago.

10 Q. Okay.

11 A. Yeah.

12 Q. I was not aware of that.

13 And what was the doctorate in?

14 A. Brigham Young.

15 It was -- it was NSCAD, the -- the Nova Scotia  
16 Academy of Art.

17 Q. Okay. Now, you -- you went to -- did you say  
18 to Brigham -- Brigham Young?

19 A. Brigham Young.

20 Q. Yeah. Okay.

21 And how long did you attend Brigham Young?

22 A. I was there two and a half years.

23 Q. Two and a -- you were there for two and a half  
24 years?

25 A. Yeah.

1 Q. Okay. Great.

2 And did you -- you did not complete your degree  
3 at BYU?

4 A. No.

5 Q. Okay. Which we have in common.

6 A. It's an odd place if you're non-Mormon.

7 Q. Yeah. I can imagine.

8 A. For four years it's a --

9 Q. And what were you studying?

10 A. Languages.

11 Q. Okay. And can you tell me, where is your  
12 primary residence currently?

13 A. London. London, England.

14 Q. Okay. And do you live there full-time?

15 A. Yes.

16 Q. What about the rest of the year? Do you live  
17 anywhere else?

18 A. I don't live anywhere else. I just travel.

19 Q. Travel.

20 A. I just travel to my other homes. And on  
21 holiday sometimes, but I don't live anywhere.

22 Q. And -- and -- and where are those other homes?

23 A. I have -- I have one in L.A.

24 Q. Uh-huh.

25 A. And I don't have any in Canada anymore. No.

1 Q. You don't have -- did you sell those  
2 properties?

3 A. Uh-huh.

4 Q. Wow.

5 A. Yeah. Yeah.

6 Q. Okay. So you don't have any homes in Canada?

7 A. No. No. No. Because I'm a full British  
8 resident now. Yeah. Lifestyle choice.

9 Q. Can I do something a little off book for a  
10 minute?

11 A. Yeah.

12 MR. HARRISON: We'll see. I mean...

13 MS. RICHARDSON: This is totally not at all  
14 what I was planning on doing, but I'm just going to put  
15 this out there before we go. Do you want to sidebar for  
16 five minutes, the two of us, before we continue this  
17 deposition? I don't know -- I'm just putting it out  
18 there. We don't have to.

19 MR. HARRISON: If you want to -- why don't we  
20 talk first. We'll take a break, we'll go off the  
21 record, and you and I can talk, if you'd like to discuss  
22 it.

23 THE WITNESS: Sure. Don't know quite what  
24 we're discussing.

25 MR. HARRISON: I don't either, but let's do it.

1 MS. RICHARDSON: We'll take a quick break.

2 THE VIDEOGRAPHER: Going off the record at  
3 10:45.

4 (A recess is taken.)

5 THE VIDEOGRAPHER: We are back on the record at  
6 11:07.

7 BY MS. RICHARDSON:

8 Q. Okay. Taylor, we were just talking about the  
9 homes that you owned; and I want to go back to that for  
10 a moment. You mentioned that you own one home in  
11 Los Angeles. Previously, you owned several. So I'm --  
12 I'm curious what those homes are, and then -- and then  
13 we can go through the sale of the other homes.

14 MR. HARRISON: Objection to form. Compound.  
15 And honestly, I don't see the relevance in --

16 MS. RICHARDSON: Understood. Objection heard.

17 BY MS. RICHARDSON:

18 Q. So the current home you own now in Los Angeles  
19 is located where?

20 A. On Channel Road.

21 Q. Channel Road.

22 Do you have any homes in Malibu, California?

23 A. I do, but I don't -- I don't own that. I just  
24 have -- I have a part of it.

25 Q. Understood. Who owns that home with you?

1 A. That's owned in -- that's owned in a trust.

2 Q. In the trust. Okay.

3 A. Yeah.

4 Q. And who is a beneficiary of the trust?

5 THE WITNESS: Is this relevant?

6 MR. HARRISON: Objection to this. Like, what  
7 is the relevance to this case? This -- this, in our  
8 view, falls under that intimidating, harassment. If you  
9 just wanted to know --

10 MS. RICHARDSON: Understood.

11 MR. HARRISON: -- that we haven't accepted your  
12 offer, you now want to dive into her personal finances,  
13 which have nothing do with this case --

14 MS. RICHARDSON: Objection. Objection heard --

15 MR. HARRISON: Okay.

16 MS. RICHARDSON: -- Counsel, and -- and noted.

17 MR. HARRISON: My suggestion -- because I'm  
18 going to cut this deposition off at some point if this  
19 is all you're going to ask. My suggestion would be that  
20 --

21 MS. RICHARDSON: I'm just starting.

22 MR. HARRISON: -- you would withdraw the  
23 question; that you ask relevant, proper questions that  
24 get to the heart of the matters in this case; and if you  
25 want to re-ask these questions at the end, we'll object

1 then, you can make your record, we will make our record.

2 MS. RICHARDSON: With all due respect, Counsel,  
3 noted. And in my deposition I answered the questions  
4 that were asked that to me were irrelevant and -- and --  
5 and I respectfully would request that unless it's a  
6 privileged question, that your client do the same, to  
7 the best of her ability.

8 MR. HARRISON: I'm just telling you, as we  
9 warned you previously in letters and in our request to  
10 the Court, at some point if you're just going to try and  
11 get at personal and financial information that is not  
12 relevant to this case, we're going to terminate the  
13 deposition.

14 MS. RICHARDSON: It is any -- anything I'm  
15 asking is directly relevant to the case. But duly  
16 noted, and thank you.

17 MR. HARRISON: It clearly is not. And again,  
18 my suggestion is you ask relevant questions that  
19 actually deal with the matter in the case and if you --  
20 as a compromise, we'll sit here and answer all those  
21 questions. If you want to re-ask these other questions  
22 at the end of the deposition and we will make our  
23 objections to them then, and then we'll terminate the  
24 deposition so that you can get your relevant questions  
25 in, I'm happy to do that.

1 MS. RICHARDSON: With all due respect, Counsel,  
2 I would like to have a chance to continue with the  
3 deposition rather than hear your reasons. They are --  
4 they are noted, and you will have your chance to remove  
5 anything from the record that is deemed improper. So --  
6 so I'm going to continue.

7 BY MS. RICHARDSON:

8 Q. So which countries do you currently maintain a  
9 residence? You mentioned that sold your homes in  
10 Canada, that you have homes in the United Kingdom?

11 A. In the United Kingdom.

12 Q. Okay. And how many homes in the United  
13 Kingdom?

14 A. I have -- I have two homes that I'm a  
15 beneficiary of. I don't own them. I don't own them  
16 outright.

17 Q. You don't own the homes outright?

18 A. Uh-huh.

19 Q. And is one of those homes in -- in Mayfair?

20 MR. HARRISON: We're not going to get into  
21 the -- that's an objection. It's an improper question.  
22 We're not getting into the specific addresses of her  
23 properties. There's local rules, I understand, that  
24 does not allow that.

25 MS. RICHARDSON: I don't believe that I asked



1 for an address, Counsel.

2 MR. HARRISON: You asked for a location.

3 THE WITNESS: A location.

4 MS. RICHARDSON: It's a general location.

5 MR. HARRISON: It's too specific.

6 THE WITNESS: Too specific.

7 MR. HARRISON: The rules don't allow it, as I  
8 understand it.

9 MS. RICHARDSON: If -- are -- are you telling  
10 your client not to answer the question?

11 MR. HARRISON: I'm telling you that it's an  
12 improper question under the local rules that you  
13 shouldn't be asking.

14 MS. RICHARDSON: I understand, and I -- I  
15 believe that's -- that's actually untrue. You -- you  
16 asked for my specific address; and, you know, that  
17 seemed to be totally proper; so I'm asking for a general  
18 area.

19 BY MS. RICHARDSON:

20 Q. So once again, tell me about the homes that you  
21 have in the United Kingdom.

22 A. My issue with disclosing that information is  
23 that I still have a recollection that's very strong of  
24 your text messages which I considered very violent. We  
25 now have security. And residences I find is something

1 that feels like an inappropriate subject under the  
2 circumstances.

3 Q. Well, you know what? That's an interesting  
4 pivot. Do you -- would you like to go and talk about  
5 that out of the gate and then we can go back to the  
6 background information?

7 MR. HARRISON: Objection to form.

8 THE WITNESS: Up to you.

9 MR. HARRISON: Argumentative.

10 BY MS. RICHARDSON:

11 Q. Understood. Understood. Why don't we table  
12 this and we'll come back to it in a little bit. Okay?

13 Can you tell me which countries you hold  
14 citizenship and where you hold lawful permanent  
15 long-term residency.

16 A. I'm a Canadian citizen.

17 Q. Okay.

18 A. And I'm a British domicile.

19 Q. British domicile. And --

20 A. British nondom. I'm a British nondom, which  
21 makes me -- I'm a British resident. I'm a British  
22 resident, Canadian -- and a Canadian citizen.

23 Q. And are there any other countries where you  
24 maintain residency or spend at least 30 days a year?

25 MR. HARRISON: Objection. Form. Compound

1 question. Also improper.

2 BY MS. RICHARDSON:

3 Q. Are there any other countries where you  
4 maintain residency?

5 A. No.

6 MR. HARRISON: I'm going to object to the last  
7 question as vague as well.

8 MS. RICHARDSON: Understood.

9 BY MS. RICHARDSON:

10 Q. Do you spend more than six months a year at  
11 your primary residence?

12 MR. HARRISON: Objection to form. Vague.

13 MS. RICHARDSON: It's pretty specific.

14 BY MS. RICHARDSON:

15 Q. You still need to answer the question,  
16 Ms. Thomson.

17 A. I don't know the exact days where I live. My  
18 primary residence is in -- is in England --

19 Q. Okay. And --

20 A. -- and I spend significant time there.

21 Q. How many days a year would you say you spend in  
22 the United States, approximately?

23 MR. HARRISON: Objection to form.

24 BY MS. RICHARDSON:

25 Q. Do you spend a substantial amount of time in

1 the United States every year?

2 MR. HARRISON: Objection. Vague.

3 BY MS. RICHARDSON:

4 Q. Do you spend time in the United States?

5 A. Yes.

6 MR. HARRISON: Objection. Vague.

7 THE WITNESS: From time to time.

8 BY MS. RICHARDSON:

9 Q. Ms. Thomson, as of today, how many residential  
10 properties do you or your trust own, in total?

11 MR. HARRISON: Objection to the form of the  
12 question. Calls for a legal conclusion. It's  
13 completely improper also.

14 MS. RICHARDSON: Understood.

15 But you still have to answer --

16 MR. HARRISON: Can you tell me what the  
17 relevance is of delving into her personal finances in  
18 her real estate. What's the relevance to this case,  
19 which is a fraud case, and your claims --

20 MS. RICHARDSON: There are -- there are --  
21 there are two claims --

22 MR. HARRISON: Your claims are defamation and  
23 intentional infliction of emotional distress. What does  
24 her finance -- personal financial history and real  
25 estate and residencies have to do with that? The answer

1 is nothing; and you, in this case, have a long  
2 history --

3 MS. RICHARDSON: Mr. Harrison --

4 MR. HARRISON: -- of trying to --

5 MS. RICHARDSON: Mr. -- I'm going to object --

6 MR. HARRISON: I'm going to make my record.

7 -- of trying to intimidate my client by  
8 threatening to release what you believe to be salacious  
9 information to the press. It's very clear that you're  
10 trying to do that again in this deposition. You haven't  
11 asked her a single question that is relevant to the  
12 topics at hand.

13 MS. RICHARDSON: Thank you -- thank you --

14 MR. HARRISON: So I'm suggesting you do because  
15 at some point --

16 MS. RICHARDSON: Thank you, Mr. Harrison.

17 MR. HARRISON: -- you're making a record that  
18 you're asking completely inappropriate questions, and  
19 we're going to terminate the deposition at some point.

20 MS. RICHARDSON: You know, if -- you are making  
21 a record of your objections --

22 MR. HARRISON: That's right.

23 MS. RICHARDSON: -- before I get a chance to  
24 ask the questions, I'm happy to let the Judge weigh on  
25 those objections.

1 MR. HARRISON: We are too.

2 MS. RICHARDSON: Okay? So thank you for the  
3 objections.

4 Again, Ms. Thomson, you do need to answer the  
5 question. The objection is on the record.

6 MR. HARRISON: What's the question?

7 MS. RICHARDSON: The question was how many  
8 residential properties you and the trust own, in total.

9 MR. HARRISON: If you know.

10 THE WITNESS: I don't know. I don't know the  
11 answer.

12 MS. RICHARDSON: You don't know how many homes  
13 you own. Okay.

14 MR. HARRISON: Objection. Argumentative.

15 That's not a question, so objection to form in  
16 many different ways.

17 BY MS. RICHARDSON:

18 Q. Ms. Thomson, can you tell me if you are  
19 currently employed by any company or in a salary  
20 position.

21 MR. HARRISON: Objection. Compound.

22 BY MS. RICHARDSON:

23 Q. Ms. Thomson, can you tell me if you are  
24 currently employed.

25 A. No.

1 Q. Can you state the year of your last salaried  
2 employment, if any.

3 MR. HARRISON: Objection. Vague.

4 THE WITNESS: It would have been before my  
5 daughter was born.

6 BY MS. RICHARDSON:

7 Q. So --

8 A. Twenty-five -- over twenty-five years ago.

9 Q. Okay. Thank you.

10 Can you please identify your primary source of  
11 income.

12 MR. HARRISON: Objection. Vague.

13 MS. RICHARDSON: Noted.

14 MR. HARRISON: Also completely improper.

15 MS. RICHARDSON: You still have to answer.

16 MR. HARRISON: Well, to the extent you can  
17 answer. To the extent you can answer.

18 THE WITNESS: It's -- it's --

19 MR. HARRISON: If you don't know, you don't  
20 know.

21 THE WITNESS: Investment -- it would be  
22 investments and dividends.

23 BY MS. RICHARDSON:

24 Q. Understood. And what was your total income for  
25 2024?



1 MR. HARRISON: Objection. Vague. Again, it's  
2 just for purposes of harassment, intimidation --

3 MS. RICHARDSON: Absolutely not.

4 THE WITNESS: I don't know. I don't know.

5 MS. RICHARDSON: It's very relevant. You asked  
6 me the same questions during your --

7 THE WITNESS: I --

8 MR. HARRISON: Well, you put your -- stop. You  
9 put your finances directly in issue in this case by  
10 saying that you had been defamed and that had affected  
11 your financial well-being. You, not anybody else, put  
12 your finances into direct relevance to this case. That  
13 is not true of Ms. Thomson's --

14 MS. RICHARDSON: Thank you. I understand.

15 MR. HARRISON: -- claims against you for fraud.

16 MS. RICHARDSON: Absolutely understood. This  
17 is very relevant.

18 So again --

19 MR. HARRISON: How?

20 MS. RICHARDSON: -- you still need to answer  
21 the question.

22 MR. HARRISON: How is it very relevant?  
23 Exactly.

24 MS. RICHARDSON: Your objection is on the  
25 record and -- and you are welcome to, you know --

1 MR. HARRISON: Well, I'll withdraw my  
2 objections if you can make a cogent argument as to how  
3 any of this is relevant in any way.

4 BY MS. RICHARDSON:

5 Q. Ms. Thomson, I'm going to ask you what your  
6 income was for 2024.

7 A. I have no idea.

8 Q. You have no idea what your income was for '24?

9 A. No.

10 Q. Was it greater than \$10 million?

11 A. I don't know.

12 Q. Okay. Do you know what your income was for  
13 2023?

14 A. No.

15 Q. You don't know?

16 A. No.

17 Q. Do you know what your income was for 2022?

18 A. No.

19 Q. You have no idea how much income you generated?

20 A. No.

21 Q. Okay. And what about for 2021?

22 MR. HARRISON: Objection to form for the last  
23 one.

24 THE WITNESS: No.

25 ///

1 BY MS. RICHARDSON:

2 Q. Okay. Let me ask that question again.

3 Do you know how much income you earned in 2021?

4 MR. HARRISON: Objection. Vague.

5 THE WITNESS: No.

6 BY MS. RICHARDSON:

7 Q. Okay. And do you know how much income you  
8 earned in 2020, approximately?

9 A. No.

10 Q. In general, is it safe to say that annually you  
11 generate an income greater than \$10 million a year?

12 MR. HARRISON: Objection --

13 THE WITNESS: I don't know.

14 MR. HARRISON: -- based on facts not in  
15 evidence.

16 BY MS. RICHARDSON:

17 Q. Now, we're going to move for a minute to -- you  
18 collect art; correct? You're an art collector?

19 A. Yes.

20 Q. Can you identify the approximate total insured  
21 value of collection last declared to your insurer?

22 A. No.

23 MR. HARRISON: Objection. Compound. Objection  
24 to the form of the question.

25 MS. RICHARDSON: Can you --

1 MR. HARRISON: Stop. You got to wait -- if I'm  
2 going to make an objection, you got to wait until I'm  
3 done with my objection, then you can answer the  
4 question, unless it's based on -- the objection is based  
5 on privilege.

6 THE WITNESS: And if you -- if you object,  
7 then -- and then I still answer the question unless it's  
8 privileged; correct?

9 MR. HARRISON: Yes. But wait for me to finish  
10 my objection.

11 THE WITNESS: Okay.

12 BY MS. RICHARDSON:

13 Q. Can you identify the approximate total value of  
14 your collection?

15 MR. HARRISON: Objection. Asked and answered.  
16 Relevance.

17 THE WITNESS: No.

18 BY MS. RICHARDSON:

19 Q. No.

20 You are friends with Jack Kilgore, who is an  
21 art dealer; correct?

22 MR. HARRISON: Objection. Compound.

23 BY MS. RICHARDSON:

24 Q. You are friends with Jack Kilgore; correct?

25 A. Yes.

Page 33

1 Q. Jack Kilgore is an art collector; correct? Or  
2 art dealer. I'm sorry.

3 A. Jack Kilgore used to be an art dealer.

4 Q. Good for Jack.

5 You are friends with Honor -- Offer Waterman;  
6 correct?

7 A. Yes.

8 Q. Offer Waterman is or used to be an art dealer;  
9 correct?

10 MR. HARRISON: Objection to form. Leading.

11 THE WITNESS: Offer Waterman is an art dealer.

12 BY MS. RICHARDSON:

13 Q. Great. And they have introduced you to works  
14 of art that you have acquired; correct?

15 MR. HARRISON: Objection.

16 THE WITNESS: Yeah.

17 BY MS. RICHARDSON:

18 Q. Correct?

19 A. Offer Waterman has sold me works in the past  
20 which I acquired from him; but ironically, I don't deal  
21 with him anymore because I discovered he was trying to  
22 take a secret commission.

23 Q. Understood.

24 MR. HARRISON: Objection. Form. Not a  
25 question. Statement.

1 THE WITNESS: Sadly.

2 BY MS. RICHARDSON:

3 Q. You established -- so Offer Waterman and you no  
4 longer communicate; correct?

5 A. No.

6 Q. And when did you find out about this  
7 undisclosed commission from Offer Waterman? Was it  
8 recent -- in the last five years?

9 A. Yes.

10 Q. In the last --

11 A. Yes.

12 Q. Yes.

13 And was it in the last two years?

14 A. I don't recall.

15 Q. Okay. That's fine.

16 You established residency in the United Kingdom  
17 in or about 2022; correct?

18 A. Yes.

19 Q. Okay. Can you identify your stated reasons for  
20 establishing UK residency.

21 MR. HARRISON: Objection to the form of the  
22 question. And again, there's no relevance to this.  
23 It's just harassing and intimidating. So I'm going to  
24 let this go on for a while, but at some point we're  
25 going to terminate this deposition.

1 MS. RICHARDSON: Again, Ms. Thomson, I just  
2 want to -- I want to take a quick moment just to inform  
3 you of -- of the rules and -- and -- as I understand  
4 them. They're not always correct. But this is a  
5 court-ordered deposition and -- as was mine, so it means  
6 that we have to answer the questions that are asked of  
7 us to the best of our ability unless they are  
8 privileged. If there are any questions that the Court  
9 deems inappropriate, harassing, problematic, those  
10 questions will be removed from the record.

11 I've agreed with your attorneys to have a  
12 moment to try to make sure that that material is, you  
13 know, kosher because I don't want anything that I say  
14 maybe accidentally to end up on the record that could be  
15 harmful to anybody. But at this point ending a  
16 deposition early or not answering a question gives me an  
17 opportunity to compel another deposition to get those  
18 questions answered, which I hope that we do not have to  
19 do.

20 MR. HARRISON: Not if they're meant solely for  
21 harassment or intimidation purposes, Ms. Richardson.

22 MS. RICHARDSON: Respectfully, Mr. Harrison, no  
23 questions I have asked have been for intimidation or  
24 harassment purposes; and none will be. So we can -- we  
25 can continue with the deposition.



1 Again, I'm going to go back to the reason that  
2 you established residency in the UK.

3 MR. HARRISON: So I'm going to direct you not  
4 answer that to the extent that it involves privileged  
5 information from lawyers who were advising you on your  
6 residency issues.

7 THE WITNESS: It is privileged.

8 BY MS. RICHARDSON:

9 Q. Why you moved to the United Kingdom was  
10 privileged? Okay. Understood.

11 A. It's privileged --

12 MR. HARRISON: There is no question pending.  
13 There was just a statement, which I will -- I guess I'll  
14 object to the form now.

15 BY MS. RICHARDSON:

16 Q. After establishing UK residency did you  
17 continue spending time in Canada?

18 A. No.

19 Q. No. Okay.

20 And after establishing UK residency did you  
21 immediately liquidate the properties that you owned  
22 there?

23 MR. HARRISON: Objection to form. Compound.  
24 Assumes facts not in evidence.

25 MS. RICHARDSON: You mentioned --

1 MR. HARRISON: -- continuing objection that I  
2 have to the irrelevance.

3 BY MS. RICHARDSON:

4 Q. You mentioned you sold your Canadian homes;  
5 correct?

6 A. Yes. I sold my Canadian homes before I left  
7 Canada.

8 Q. Thank you. Thank you for that.

9 MR. HARRISON: Objection to form.

10 BY MS. RICHARDSON:

11 Q. Between -- between 2020 and 2025 -- let me  
12 rephrase the question.

13 You count the days that you spend in the United  
14 States; correct?

15 MR. HARRISON: Objection to form and relevance.  
16 And just to be clear for the record, when I'm objecting  
17 to relevance what I'm saying is that I believe these --  
18 we believe these questions to be solely for purposes of  
19 harassment. So just so --

20 MS. RICHARDSON: You made that very -- you made  
21 that very clear.

22 MR. HARRISON: -- it's clear on the record.

23 MS. RICHARDSON: Yeah. I'm just going to  
24 assume that with every question that you object to from  
25 here on out.

1 THE WITNESS: Yes, I count my days here.

2 BY MS. RICHARDSON:

3 Q. Understood.

4 A. America has rules. They have -- they have  
5 rules of how much time, if you're -- because I'm not an  
6 American --

7 Q. Understood.

8 A. -- that you can spend in the States.

9 Q. Now, what are those rules? What happens if you  
10 spend more than the allotted number of days?

11 A. I don't --

12 MR. HARRISON: Objection. Calls for  
13 speculation. Calls for a legal conclusion.

14 THE WITNESS: I don't know what happens.

15 BY MS. RICHARDSON:

16 Q. Okay.

17 A. If you spend more than you're allowed to, my  
18 understanding is you don't come back -- you're not  
19 allowed in the country for years.

20 Q. Yeah.

21 A. Yeah.

22 Q. And that's -- especially now, I'm sure.

23 A. Yeah. People -- that's fine. One counts days  
24 because one does not want to be outside with the days in  
25 America.

1 Q. Now, is there also a scenario where if you  
2 overstayed those days, you would have tax implications?

3 MR. HARRISON: Objection. Calls for a legal  
4 conclusion. Calls for speculation. It's not a proper  
5 question.

6 BY MS. RICHARDSON:

7 Q. From -- you mentioned, when we talked earlier  
8 about your education history, you did not graduate from  
9 BYU but you got an honorary degree; correct?

10 A. Yes.

11 Q. From 2016 to 2018 were you enrolled as a  
12 student in the United States?

13 MR. HARRISON: Objection to form.

14 THE WITNESS: No.

15 BY MS. RICHARDSON:

16 Q. No, you were not.

17 From twenty --

18 A. Oh, I did a Berlitz, music -- Berlitz,  
19 French --

20 Q. Okay.

21 A. -- class, yeah --

22 Q. And --

23 A. -- course.

24 Q. And how long was that course?

25 A. I don't recall. I don't -- I don't recall.

1 Q. And what were you studying?

2 A. I was brushing up on my French.

3 Q. Understood. And you mentioned that you were in  
4 the United States under nondom status; is that correct?

5 MR. HARRISON: Objection --

6 THE WITNESS: No.

7 MR. HARRISON: -- to form. Assumes facts not  
8 in evidence.

9 THE WITNESS: In the United States -- in  
10 England.

11 BY MS. RICHARDSON:

12 Q. I'm sorry. I'm sorry.

13 A. England -- England nondom.

14 Q. Yes. Okay.

15 And at any point did you consider or apply for  
16 residency in the UAE, Dubai, United Emirates?

17 MR. HARRISON: Objection -- objection to form.  
18 Calls for a legal conclusion.

19 What is the relevance of this? How is this in  
20 any way relevant to this case?

21 MS. RICHARDSON: Understood.

22 THE WITNESS: I mean, I can answer the  
23 question. It's random.

24 MR. HARRISON: I agree.

25 THE WITNESS: I'll just answer.

1 MR. HARRISON: Okay.

2 THE WITNESS: No.

3 BY MS. RICHARDSON:

4 Q. Is that a no?

5 A. Yeah, it's a no.

6 Q. Okay. So at present the only countries where  
7 you are a citizen is Canada; correct?

8 A. Yes.

9 Q. Understood. Now, I'm going to move for a  
10 moment to -- to your family.

11 You are a member of the Thomson family;  
12 correct?

13 A. Yes.

14 Q. And the Thomson family is one of the wealthiest  
15 families in Canada; correct?

16 MR. HARRISON: Objection to form.

17 THE WITNESS: Yes.

18 BY MS. RICHARDSON:

19 Q. Is your family's wealth managed through the  
20 Woodbridge Company that controls Thomson Reuters?

21 MR. HARRISON: Objection. Objection to form.  
22 Assumes facts not in evidence. Same relevance objection  
23 as well.

24 THE WITNESS: I wouldn't know the answer to  
25 that question.

1 BY MS. RICHARDSON:

2 Q. Okay. But -- let me try to rephrase it.

3 Is your wealth managed by Woodbridge, the --

4 A. No.

5 MR. HARRISON: Object -- sorry.

6 THE WITNESS: Sorry.

7 MR. HARRISON: Objection to form.

8 MS. RICHARDSON: Let's -- let's pivot from that  
9 for a second.

10 MR. HARRISON: Vague.

11 BY MS. RICHARDSON:

12 Q. Control of the family line in your family is  
13 structured to pass through men only; is that correct?

14 MR. HARRISON: Objection to form. Assumes  
15 facts not in evidence. Vague.

16 BY MS. RICHARDSON:

17 Q. Okay. You have described yourself as being  
18 locked out of meaningful control of your financial  
19 future from your brothers; correct?

20 MR. HARRISON: Objection. Compound. Leading.  
21 Vague.

22 THE WITNESS: No.

23 BY MS. RICHARDSON:

24 Q. Have your brothers made it harder for you than  
25 other members of the family to have control over your

1 finances?

2 MR. HARRISON: Objection. Same harassment and  
3 intimidation objection, by the way.

4 MS. RICHARDSON: Thank you. Noted.

5 BY MS. RICHARDSON:

6 Q. You do have to answer that one.

7 A. No, they haven't.

8 Q. They have not made it harder for you to have  
9 control?

10 A. They have not.

11 Q. Okay.

12 A. I have trustees.

13 Q. You have trustees.

14 A. Nothing to do with my brothers.

15 Q. Do you have full control and access to your  
16 finances at all times?

17 A. We have trustees --

18 MR. HARRISON: Objection -- objection to form.  
19 Objection to, again --

20 THE WITNESS: It depends. There's different --  
21 there are -- if -- if you're talking my personal income,  
22 of course.

23 BY MS. RICHARDSON:

24 Q. Right.

25 A. Personal income, yes.



1 Q. And is your personal income generated from the  
2 dividends, or is that independent?

3 A. It's from various things.

4 Q. In 2020 you drafted an email to your brothers  
5 complaining that a branch of the family was -- that your  
6 branch of the family was completely locked out of  
7 stewarding our financial future wealth.

8 Do you remember saying that?

9 MR. HARRISON: Objection to form. Compound.  
10 Also miss -- misstates the -- misstates evidence and  
11 refers to facts not in evidence at all.

12 THE WITNESS: I drafted -- I drafted an email  
13 to the boys because I had a -- because I had a notion  
14 that it would be -- it would be -- it would be better to  
15 not have to deal through trustees.

16 BY MS. RICHARDSON:

17 Q. You also stated that you've always been one for  
18 riskier investments?

19 MR. HARRISON: Objection to form. Vague.

20 BY MS. RICHARDSON:

21 Q. Did you not?

22 A. Yes.

23 Q. Okay.

24 A. I never sent that letter, by the way.

25 Q. Understood. You also wrote, "Restrictive

Page 45

1 compliance put in place in 2020 completely removed any  
2 opportunity of me stewarding meaningful investments."

3 Do you remember saying that?

4 MR. HARRISON: Objection to form. Assumes  
5 facts not in evidence. Vague.

6 THE WITNESS: And -- and it's not -- and  
7 it's -- and it needs further explanation because I'm not  
8 speaking of my personal wealth.

9 BY MS. RICHARDSON:

10 Q. Understood.

11 A. I'm speaking of trust wealth.

12 Q. Okay. Okay. That's an important distinction.

13 A. Yeah.

14 Q. Isn't it true that these restrictions prevented  
15 you from accessing the family investment funds directly  
16 from approximately 2020 onward?

17 MR. HARRISON: Objection to form. Compound.  
18 Assumes facts not in evidence. And the same harassment,  
19 intimidation.

20 THE WITNESS: Yeah.

21 MR. ANDRE: Also --

22 THE WITNESS: It's incorrect. No.

23 BY MS. RICHARDSON:

24 Q. Were there restrictions that were not  
25 previously in place from 2020 onwards?

1 MR. HARRISON: I'm going to object to the form  
2 as vague. I'm also going to direct you, to the extent  
3 that it requires you to violate privilege, to the extent  
4 that you got legal advice --

5 THE WITNESS: Exactly.

6 MR. HARRISON: -- regarding the trust or  
7 whatever -- your finances --

8 THE WITNESS: Exactly.

9 MR. HARRISON: -- that you should not answer.

10 BY MS. RICHARDSON:

11 Q. Let's -- let me try a different question.

12 Let's -- let's move for something else.

13 When you began purchasing cryptocurrency, that  
14 was independent of --

15 A. That was mine personally.

16 Q. That was your personal --

17 MR. HARRISON: Let her finish the question  
18 before you answer the question.

19 THE WITNESS: Sorry.

20 BY MS. RICHARDSON:

21 Q. Has your brother David expressed concern about  
22 the handling of your money?

23 MR. HARRISON: Objection. Vague.

24 BY MS. RICHARDSON:

25 Q. Has your brother David expressed concern about

1 your access to your funds?

2 MR. HARRISON: Objection. Vague.

3 THE WITNESS: No.

4 MR. HARRISON: Also -- got to wait till I  
5 finish.

6 BY MS. RICHARDSON:

7 Q. You have referred to limitations placed on you  
8 as discriminatory; correct?

9 MR. HARRISON: Objection. Vague. Assumes  
10 facts not in evidence. Leading.

11 THE WITNESS: Yes.

12 BY MS. RICHARDSON:

13 Q. Thank you.

14 You have acknowledged yourself that you have  
15 historically preferred high-risk, high-reward  
16 investments; correct?

17 MR. HARRISON: Objection --

18 THE WITNESS: It's all relative.

19 MR. HARRISON: -- compound in nature.

20 THE WITNESS: That's just relative.

21 BY MS. RICHARDSON:

22 Q. Can you tell me about -- your grandfather  
23 created the Thomson company; correct?

24 A. Yes.

25 Q. And can you tell me what that company was at

1 the outset.

2 MR. HARRISON: Objection to form. Vague.

3 BY MS. RICHARDSON:

4 Q. Your grandfather --

5 A. Media company.

6 Q. Thank you.

7 At one point your grandfather had a joint  
8 venture with -- with John Paul Getty; correct?

9 A. Correct.

10 Q. And that venture was, would you say, on the  
11 riskier side of investments? Correct?

12 MR. HARRISON: Objection. Vague. Calls for  
13 speculation. Calls for a legal conclusion. To the  
14 extent that it involves privilege somehow, I'm directing  
15 you not to answer it.

16 BY MS. RICHARDSON:

17 Q. Ms. Thomson, what did -- what was the business  
18 venture your grandfather entered into with John Paul  
19 Getty?

20 MR. HARRISON: Objection. Vague.

21 We are -- we're in agreement -- right? -- that  
22 I have a continuing objection on the record from you,  
23 Ms. Richardson --

24 MS. RICHARDSON: I -- I am well aware. Thank  
25 you.

1 MR. HARRISON: -- completely irrelevant and  
2 intended solely for intimidation and harassment? We  
3 have an agreement; right? You're not going to say later  
4 on that I wasn't objecting to these questions even if I  
5 don't verbally --

6 MS. RICHARDSON: I think you're making it very  
7 clear, Todd. Thank you.

8 MR. HARRISON: -- object for each question?

9 MS. RICHARDSON: Yes. Thank you.

10 THE WITNESS: North Sea oil.

11 DEPOSITION OFFICER: I'm sorry?

12 THE WITNESS: North Sea oil.

13 BY MS. RICHARDSON:

14 Q. This investment had a substantial -- created a  
15 substantial windfall for your family; correct?

16 MR. HARRISON: Objection. Vague. Calls for  
17 speculation.

18 THE WITNESS: That -- it was a successful  
19 venture.

20 BY MS. RICHARDSON:

21 Q. You considered yourself more like your  
22 grandfather than your brothers; correct?

23 MR. HARRISON: Objection. Vague.

24 BY MS. RICHARDSON:

25 Q. You -- as it relates to the investments you

1 made, you saw your grandfather's visionary capability to  
2 be something aspirational; correct?

3 A. Correct.

4 Q. Did that belief motivate some of your  
5 investment decisions?

6 MR. HARRISON: Objection. Vague. To the  
7 extent it calls for -- let me -- let me --

8 MS. RICHARDSON: Do you -- do you --

9 MR. HARRISON: Everybody, let me just finish.

10 To the extent that it calls for any sort of  
11 privileged communication, like advice that you got from  
12 lawyers, I would direct you not to answer.

13 BY MS. RICHARDSON:

14 Q. Ms. Thomson, do you remember telling me that  
15 you saw crypto as being an opportunity similar to your  
16 grandfather -- grandfather's oil investment?

17 A. I don't remember that exact analogy, how -- or  
18 I was -- my initial investment in crypto was very early  
19 days, as was his investment in the oil.

20 Q. Understood.

21 A. And it was very intuitive and instinct.

22 Q. Let's take a moment, actually. That's a  
23 good -- are you doing okay?

24 A. (No audible response.)

25 Q. Very good.

1 I'm going to move for a moment and ask you when  
2 you first learned about Bitcoin, approximately.

3 A. When it was \$8,000.

4 Q. Would that be about 2017?

5 A. I don't know the exact date, but it was when --  
6 when it was 8,000.

7 Q. Okay.

8 A. It's before it started moving up.

9 Q. And who introduced you to Bitcoin?

10 A. A gentleman that -- that -- that was a  
11 consultant that was very -- himself very involved in  
12 the -- in the space.

13 Q. And -- and what was his name?

14 A. His name was Mike Foss.

15 Q. Okay. And can you describe the role that Mike  
16 Foss's services provided for you.

17 A. Mike was providing security.

18 Q. He was providing security.

19 Did he provide security for you in -- in all  
20 your homes worldwide or -- or --

21 A. Just L.A.

22 Q. He -- he provided security in Los Angeles.

23 Do you recall discussing Bitcoin with me when  
24 you purchased it?

25 MR. HARRISON: Objection. Vague.



1 BY MS. RICHARDSON:

2 Q. Do you recall --

3 A. No.

4 Q. -- discussing Bitcoin with me?

5 MR. HARRISON: Objection. Vague.

6 THE WITNESS: Not when I purchased.

7 BY MS. RICHARDSON:

8 Q. Okay.

9 A. Not -- not in those early days.

10 Q. You don't remember having those conversations  
11 with me?

12 MR. HARRISON: Objection. Vague.

13 Argumentative.

14 BY MS. RICHARDSON:

15 Q. On or about 2017 do you remember encouraging me  
16 to buy Bitcoin?

17 MR. HARRISON: Objection. Leading --

18 THE WITNESS: No.

19 MR. HARRISON: -- vague.

20 THE WITNESS: I don't remember.

21 MR. HARRISON: You really got to wait until

22 I --

23 THE WITNESS: I'm so sorry.

24 MR. HARRISON: -- finish talking before you

25 talk.

1 BY MS. RICHARDSON:

2 Q. You don't have any memory of -- of telling me  
3 that I should buy as much Bitcoin as I could?

4 MR. HARRISON: Objection. Vague.  
5 Argumentative.

6 THE WITNESS: I would not have presumed to know  
7 how much money you had because Bitcoin even then was  
8 a -- 12,000 a coin. It wasn't -- it wasn't inexpensive,  
9 which is, my recollection, why you went into altcoins,  
10 because they were very affordable and they made sense.

11 BY MS. RICHARDSON:

12 Q. That makes sense.

13 At the time you told me about Bitcoin, it was,  
14 I believe, December of 2017 and -- and I purchased  
15 Bitcoin when it was, I think, \$17,000.

16 Do you remember being excited about Bitcoin at  
17 that point?

18 A. Well, I remember being excited --

19 MR. HARRISON: Just objection. Compound  
20 question. Asked and answered. And vague.

21 Go ahead.

22 BY MS. RICHARDSON:

23 Q. Do you remember in 2017 being excited about  
24 Bitcoin going up and talking about it?

25 A. I don't remember the exact year; but I do

1 remember very quickly after I invested, it -- it was  
2 moving.

3 Q. Understood.

4 A. It was a very volatile, interesting time to be  
5 in Bitcoin.

6 Q. And were you aware that because of your  
7 encouragement, I purchased a large amount of Bitcoin at  
8 that time?

9 MR. HARRISON: Objection. Vague. Leading.  
10 Assumes facts not in evidence --

11 THE WITNESS: No.

12 MR. HARRISON: -- and argumentative. Just --  
13 excuse me.

14 Ms. Thomson, please wait to answer the question  
15 until I am finished --

16 THE WITNESS: Sorry.

17 MR. HARRISON: -- speaking. Thank you.

18 BY MS. RICHARDSON:

19 Q. Do you --

20 A. Can I clarify that?

21 Q. Sure. Absolutely.

22 A. I would not have presumed, because your -- my  
23 financial situation is different from yours, that you  
24 would mimic in any way any of the investments I was  
25 doing if -- unless you felt that the risk was something

1 that you didn't have to think twice about, and I  
2 couldn't imagine that being the case. It was -- you  
3 were mindful.

4 Q. Yeah. Well, I didn't have a -- you know, a lot  
5 of funds.

6 A. Yeah.

7 MR. HARRISON: Objection to form. Statement,  
8 not a question.

9 MS. RICHARDSON: You're absolutely right.

10 BY MS. RICHARDSON:

11 Q. Shortly after that point when Bitcoin hit, I  
12 think, \$17,000, it dropped substantially.

13 Do you remember that?

14 A. I do remember Bitcoin dropped.

15 Q. Yes. After Bitcoin dropped do you remember  
16 telling me and others that you were upset with Mike for  
17 suggesting the investment?

18 MR. HARRISON: Objection. Vague. Compound.

19 You can answer.

20 THE WITNESS: No.

21 BY MS. RICHARDSON:

22 Q. At the time do you recall me saying that I also  
23 lost quite a bit of money?

24 A. No.

25 Q. And you understand that because I had limited

1 means, the losses would have been more significant?

2 MR. HARRISON: Objection. Prejudicial.

3 Leading. Vague. Unsupported by facts in evidence.

4 THE WITNESS: Should I --

5 MS. RICHARDSON: You under --

6 MR. HARRISON: You can answer now, yeah.

7 THE WITNESS: Yeah.

8 MR. HARRISON: If you can. To the extent you  
9 can.

10 THE WITNESS: Sorry. Do you mind asking again?

11 BY MS. RICHARDSON:

12 Q. Yes. Absolutely.

13 Did you understand that my losses were  
14 significant to -- based on my financial circumstances?

15 MR. HARRISON: Objection. Vague. Assumes  
16 facts not in evidence.

17 Go ahead. You can --

18 BY MS. RICHARDSON:

19 Q. Okay. Let me -- let me rephrase the question.

20 Based on my financial circumstances, a Bitcoin  
21 drop would have been significant for me; correct?

22 MR. HARRISON: Objection. Vague.  
23 Speculative --

24 MS. RICHARDSON: Okay.

25 MR. HARRISON: -- based on facts not in

1 evidence.

2 MS. RICHARDSON: You can still answer.

3 MR. HARRISON: You can answer, to the extent  
4 that you can answer.

5 THE WITNESS: I would have -- that -- I had --  
6 I just said that the fact is that it wouldn't have  
7 occurred to me that you would be, in your position at  
8 that time or any time, making an investment that you  
9 couldn't afford to lose; and I knew I was in a very  
10 different financial position.

11 BY MS. RICHARDSON:

12 Q. Under --

13 A. I'm really sorry if you lost money going into  
14 it but --

15 Q. That's okay.

16 Did --

17 A. And I, of course -- that's -- that's why I just  
18 said that I would never presume it, because I know -- I  
19 knew and know that you would not have been able, you  
20 know, to comfortably tolerate a significant loss. It  
21 would be meaningful.

22 Q. But is it fair to assume that my decision to  
23 make a Bitcoin purchase was my own financial decision?

24 MR. HARRISON: Objection. Calls for  
25 speculation. Facts not in evidence.

1 THE WITNESS: I don't even recall you buying  
2 it, so --

3 BY MS. RICHARDSON:

4 Q. Understood. So if you don't recall me buying  
5 it, I'm going to ask you --

6 A. Then you -- you would have been making your own  
7 decision.

8 Q. If I --

9 MR. HARRISON: Can you -- you got to let her  
10 get her question out first before you answer it.

11 THE WITNESS: Okay. Sorry.

12 BY MS. RICHARDSON:

13 Q. You do not remember me buying it, we've just  
14 established; correct?

15 A. Yes.

16 Q. I think it's safe for me to assume, then, you  
17 don't remember me blaming you for the loss; correct?

18 MR. HARRISON: Objection. Assumes facts not in  
19 evidence. Vague.

20 BY MS. RICHARDSON:

21 Q. I never blamed you for that loss, did I?

22 A. I don't remember. I don't remember you buying  
23 it. I don't remember a scenario with you. I remember  
24 you with the altcoins later as your big stake thing.

25 Q. You have -- you have no memory of me ever

1 accusing you of causing my losses?

2 MR. HARRISON: Objection. Calls for  
3 speculation. Asked and answered. Vague.

4 THE WITNESS: I didn't realize you had losses.

5 MS. RICHARDSON: Exactly. Okay. Thank you.

6 MR. HARRISON: Objection to form. Just a  
7 statement, not a question.

8 BY MS. RICHARDSON:

9 Q. Mike Foss was your head of security --  
10 correct? -- for Los Angeles?

11 A. Yes.

12 Q. Thank you.

13 As head of security, was Mike responsible for  
14 gathering information about your daughter's former  
15 nanny?

16 MR. HARRISON: Objection. What could this  
17 possibly have to do with this lawsuit that you have been  
18 allowed by the Court to conduct a deposition on?

19 MS. RICHARDSON: Thank you. Your objection is  
20 noted.

21 MR. HARRISON: Okay. So just to be clear, it's  
22 the same irrelevance and harassing and intimidating line  
23 of questioning.

24 BY MS. RICHARDSON:

25 Q. You still have to answer the question.



1 A. Mike handled the security of our residence.

2 Q. Okay. Was information that Mike obtained used  
3 towards a nanny's termination?

4 MR. HARRISON: Objection. Assumes facts not in  
5 evidence. Vague. And my same standing objection to  
6 harassment, intimidation.

7 MS. RICHARDSON: Thank you.

8 THE WITNESS: There were many reasons the nanny  
9 was -- was -- was fired. The main, ultimate reason was  
10 we found her stealing --

11 BY MS. RICHARDSON:

12 Q. How did you --

13 A. -- from us.

14 Q. And how did you find that out?

15 A. Because she had items of ours in her room.

16 Q. Okay.

17 A. And the housekeeper saw checks that were from  
18 secondhand stores, which, when we checked it out, had  
19 items of ours in it --

20 Q. Understood. Are you aware --

21 A. -- as well as other things.

22 She was throwing parties in the place when I  
23 wasn't -- because I didn't live in L.A. full-time, so  
24 there were photographs which was showed to me later of  
25 her having parties -- like, the mess after parties,

1 champagne bottles everywhere. You know, sofa was all  
2 getting ruined from what she was doing.

3 Q. And -- and during this time, are you aware that  
4 your daughter, Madeleine, informed me that she had  
5 listened to audio footage of -- of the nanny saying  
6 unfavorable things about her?

7 MR. HARRISON: Objection.

8 THE WITNESS: No.

9 MR. HARRISON: Hearsay. Calls for speculation.  
10 Vague. And assumes facts not in evidence. And it's  
11 also testifying by the questioner.

12 BY MS. RICHARDSON:

13 Q. Did you at any time record your employees with  
14 video or audio footage that they were unaware of?

15 MR. HARRISON: Objection. Vague. Leading.  
16 Assumes facts not in evidence. Objection specifically  
17 to "you" -- to the word "you" recording.

18 THE WITNESS: No.

19 BY MS. RICHARDSON:

20 Q. Let me withdraw the question.

21 Was video surveillance something that was  
22 common on your properties?

23 MR. HARRISON: Same objections to just  
24 irrelevant questioning into personal issues that have  
25 nothing do with --

1 MS. RICHARDSON: Thank you. Noted, Counsel.

2 MR. HARRISON: -- this litigation.

3 THE WITNESS: For security reasons, it's  
4 standard protocol that there are cameras. All staff  
5 know in all houses that there are cameras.

6 BY MS. RICHARDSON:

7 Q. Is it standard protocol to have audio  
8 recordings in your vehicles?

9 MR. HARRISON: Objection. Assumes facts not in  
10 evidence. Vague. And calls for a legal conclusion.

11 MR. ANDRE: Also calls for speculation.

12 THE WITNESS: No.

13 BY MS. RICHARDSON:

14 Q. Is it standard practice for you to have audio  
15 recording in your vehicles?

16 A. No.

17 Q. No.

18 Let's go back for a moment to a time when  
19 Madeleine was younger. You retained attorney Bert  
20 Fields in connection with a custody dispute in the early  
21 2000s; correct?

22 MR. HARRISON: Objection. Leading.  
23 Speculative. Vague. And the same harassment and  
24 intimidation objection.

25 MS. RICHARDSON: Thank you.

1 THE WITNESS: Do I answer the question?

2 MR. HARRISON: To the -- if -- if you can, yes,  
3 without revealing -- unless there's --

4 MS. RICHARDSON: This is on public record.

5 MR. HARRISON: I'm speaking. Unless there is  
6 privileged information that would be part of the answer.  
7 So she's asking about hiring attorneys in the two --  
8 early 2000s.

9 THE WITNESS: Well, it's -- it's legal. It  
10 was -- was legal information.

11 BY MS. RICHARDSON:

12 Q. It's not about -- it's not about information  
13 you shared with your attorney. It's just about if he  
14 was your attorney at the time.

15 A. Yes. Bert -- I consulted with Bert at that  
16 time.

17 Q. Okay. And during that period, did Anthony  
18 Pellicano perform investigative work pertaining to you?

19 MR. HARRISON: Objection. Vague. Calls for, I  
20 suppose, a legal conclusion. And the same intimidate --  
21 intimidation, harassment, completely irrelevant to this  
22 case.

23 MR. ANDRE: And also just, Ms. Richardson, to  
24 the extent -- Ms. Thomson, to the extent answering a  
25 question would require you to disclose conversations

Page 64

1 you've had with your attorney, you should not answer the  
2 questions. You can only -- only answer the questions to  
3 the extent it would not require you to disclose  
4 confidential conversations you had with your attorney in  
5 connection with that matter.

6 THE WITNESS: Then it was -- I think he was  
7 hired through attorneys.

8 MR. HARRISON: Then that would call for --

9 MR. ANDRE: Then that's --

10 MR. HARRISON: -- privileged information.

11 MS. RICHARDSON: Okay.

12 MR. HARRISON: You shouldn't answer that.

13 BY MS. RICHARDSON:

14 Q. Pamela Miller -- who used to be your nanny;  
15 correct?

16 A. Yes.

17 Q. Okay. And Pamela Miller provided statements  
18 and testimony to federal authorities in the Pellicano  
19 investigation; correct?

20 MR. HARRISON: Objection. Calls for  
21 speculation. Legal conclusion. Completely irrelevant.

22 MS. RICHARDSON: You have -- it's not  
23 privileged.

24 MR. HARRISON: Unless the -- unless the answer  
25 involves privileged information or information you got

1 through a lawyer, then you shouldn't answer.

2 MR. ANDRE: To the -- if you can answer  
3 without -- to the extent answering the question would  
4 require you to disclose information you learned from  
5 your lawyers or in connection with from your lawyers,  
6 you should not answer the question. If you have  
7 information you know outside of the scope -- that you  
8 obtained outside of the scope of that representation,  
9 then you can answer the question.

10 MS. RICHARDSON: This is not -- this is not  
11 privileged.

12 MR. HARRISON: Objection -- objection.

13 MS. RICHARDSON: Okay.

14 MR. HARRISON: You are not our client's  
15 attorney, so you are not allowed to give her legal  
16 advice --

17 MS. RICHARDSON: Understood. Understood --

18 MR. HARRISON: -- or legal direction.

19 MS. RICHARDSON: -- Counsel. Thank you. I  
20 apologize.

21 MR. HARRISON: I don't think you do understand,  
22 so I wanted to make that clear.

23 MS. RICHARDSON: Okay.

24 THE WITNESS: Can I clarify. The question  
25 was --

1 BY MS. RICHARDSON:

2 Q. Absolutely.

3 A. -- did Pamela --

4 Q. Pamela Miller provided statements and testimony  
5 to federal authorities in the Pellicano investigation;  
6 correct?

7 MR. HARRISON: Objection. Same objections as  
8 before.

9 MR. ANDRE: To the extent you can answer the  
10 question without basing your answer on information you  
11 learned from your counsel, you can answer. If the only  
12 way you have to answer the question is based on  
13 discussion you had with your lawyers, then you cannot  
14 answer the question.

15 BY MS. RICHARDSON:

16 Q. Let me rephrase the question.

17 A. Okay.

18 Q. Let me try to rephrase the question.

19 It was widely reported in the news that Pamela  
20 Miller provided statements and testimony to the federal  
21 authorities in the Pellicano investigation.

22 Are you aware of this?

23 A. Yes.

24 MR. HARRISON: Objection. Compound. Vague.

25 MS. RICHARDSON: Okay. It's okay.

1 MR. ANDRE: Ms. Thomson --

2 THE WITNESS: I'm so sorry. I did answer yes.

3 BY MS. RICHARDSON:

4 Q. In 2008 you filed publicly papers to intervene  
5 in the Pellicano criminal case to suppress Pamela  
6 Miller's testimony.

7 Do you remember this?

8 MR. HARRISON: Objection. Same continuing  
9 objection. Compound question.

10 BY MS. RICHARDSON:

11 Q. In 2008 --

12 A. It was privileged.

13 Q. -- you filed -- no. It's publicly filed.

14 MR. HARRISON: Okay. You cannot testify.  
15 Okay? And you cannot give my client legal advice or  
16 direction. Okay?

17 MS. RICHARDSON: Understood.

18 MR. HARRISON: You can ask questions, but you  
19 can't do that.

20 MS. RICHARDSON: That's not legal advice. I'm  
21 clarifying that this is not a privilege matter. This  
22 is -- we're talking about a publicly filed matter --

23 MR. HARRISON: That calls for a legal -- that  
24 calls for a legal conclusion --

25 MS. RICHARDSON: I am asking --



1 MR. HARRISON: -- whether something is  
2 privileged or not.

3 MS. RICHARDSON: I am asking about an event  
4 that occurred. I'm not asking -- asking for anything  
5 privileged. I'm not asking for her to -- to come to a  
6 legal conclusion.

7 I'm asking very simply if in 2008 you filed  
8 papers to intervene in the Pellicano criminal case to  
9 suppress Pamela Miller's testimony.

10 MR. HARRISON: So objection. Compound.

11 If you can answer without intruding upon any  
12 advice that -- or conversations you may have had with an  
13 attorney at the time, then you can answer the question;  
14 but if answering the question would involve privileged  
15 information relating to any discussions with an  
16 attorney --

17 MS. RICHARDSON: Counsel --

18 MR. HARRISON: -- at the time, then you  
19 can't -- I'm directing you not to answer the question.

20 MS. RICHARDSON: With all due respect, you're  
21 running the clock on -- on a question that I just asked  
22 your client about a public filing. I'm not asking her  
23 to give me any privileged information or a legal  
24 conclusion.

25 MR. HARRISON: You're not here to testify,

1 Ms. Richardson. You can ask questions, I can make  
2 objections, but you're not here to testify.

3 THE WITNESS: I cannot answer. I do not know  
4 the answer.

5 MS. RICHARDSON: You don't -- if you don't  
6 remember, that's okay. You can say "I don't remember."

7 MR. HARRISON: Objection. Again, you cannot  
8 give my client direction about how she should testify.  
9 That's our job.

10 MS. RICHARDSON: Understood.

11 BY MS. RICHARDSON:

12 Q. You filed publicly papers to intervene in the  
13 Pellicano criminal case to suppress Pamela Miller's  
14 testimony in 2008. In that testimony you asserted that  
15 Ms. Miller's testimony would be prejudicial to you.

16 Do you have memory of this?

17 MR. HARRISON: Objection. Multiple compound  
18 questions. Calls for speculation. To the extent it  
19 involves any privileged information, I'm directing you  
20 not to answer it. If you can answer it without  
21 impinging upon any conversations you had with a lawyer  
22 or legal advice that you got in relation to those legal  
23 filings, then you can answer the question.

24 THE WITNESS: I can't answer the question.

25 ///

1 BY MS. RICHARDSON:

2 Q. Okay. Why can't you answer the question?

3 MR. HARRISON: Objection. Argumentative.

4 Asked and answered.

5 BY MS. RICHARDSON:

6 Q. You don't know? Okay.

7 A. Because I don't know. That was a long time  
8 ago, and there was a lot of litigation and things around  
9 Pamela.

10 Q. Okay. I'm going to table that and go back to  
11 it later.

12 For today's questions I just want to establish  
13 some -- some understanding of -- of what the words I'm  
14 about to use pertain to. "Claim" means any lawsuit; but  
15 it also means an arbitration, an administrative charge,  
16 a tribunal complaint, police report, or demand letter  
17 that alleged wrongdoing by you or an entity you control.  
18 So as I -- as I go through this section, I just want you  
19 to know "claim" is not specific to a filed lawsuit; but  
20 it kind of, you know, covers that broad spectrum.

21 A. Can I ask a question?

22 Q. Sure.

23 MR. HARRISON: Wait. Wait. Wait. Whoa.

24 Whoa. Whoa. Objection that you cannot make a speech,  
25 one; you cannot give my client legal direction, two; and

1 you cannot make up and enforce your own definitions of  
2 different things.

3 You can ask questions, and she can try to the  
4 best of her ability, but you can -- you can't do that.

5 MS. RICHARDSON: Great. I was trying to make  
6 it easier because I just wanted to -- I can go through  
7 every time I -- I ask.

8 BY MS. RICHARDSON:

9 Q. But since 2000 have you been a party to any  
10 claim or proceeding that involves your staff?

11 MR. HARRISON: Objection. Compound. Vague.  
12 In terms of "claim or proceeding," if the answer would  
13 involve any privileged information like where you had a  
14 discussion with an attorney or got legal advice from an  
15 attorney, then I'm directing you not to answer that  
16 question.

17 MS. RICHARDSON: I'm not asking for anything  
18 privileged. I'm not asking for anything privileged.  
19 I'm asking for the claim itself.

20 MR. ANDRE: And, Ms. Richardson, just to be  
21 clear, part of what we're trying to do is make sure that  
22 we're advising our client and reminding her not to  
23 disclose privileged information; and we're telling her  
24 to make sure that if -- make sure that she limits her  
25 answer, if possible, to nonprivileged information. You

1 need to allow us to make sure that we provide that --

2 MS. RICHARDSON: Absolutely.

3 MR. ANDRE: -- that advice for our client on  
4 the record.

5 MS. RICHARDSON: Okay. That's -- understood.  
6 Thank you.

7 MR. ANDRE: Thank you.

8 THE WITNESS: So can you repeat that again.

9 BY MS. RICHARDSON:

10 Q. Sure. Since 2000 -- the year 2000 have you  
11 been a party to any claim or proceeding in Canada or the  
12 United States relating to your staff?

13 MR. HARRISON: Okay. So objection to compound.  
14 Objection to vague. Objection -- and I'm directing you  
15 again, to the extent that it would impinge upon a legal  
16 privilege, for instance, advice that you got from  
17 attorney or conversations with attorney -- privileged  
18 conversation with attorney --

19 MS. RICHARDSON: Okay.

20 MR. HARRISON: -- then I'm directing you not to  
21 answer that question. If you can answer it without  
22 relating to privileged information --

23 MS. RICHARDSON: Counsel --

24 MR. HARRISON: -- then you can try and answer  
25 to the best of your ability. But I've got my continuing

1 objection that this question since 2000 is just  
2 harassment and intimidation, not --

3 MS. RICHARDSON: I'm asking for a history of  
4 complaints -- of -- of issues with staff, complaints  
5 against you or complaints against them.

6 MR. HARRISON: Objection. Form.

7 MS. RICHARDSON: It's not a -- it's not a  
8 complicated question.

9 MR. HARRISON: Objection to form. It's  
10 argumentative. It's vague --

11 MS. RICHARDSON: Okay. Let me try this again.

12 MR. HARRISON: -- form of the question.

13 BY MS. RICHARDSON:

14 Q. Have you ever had a staff member file a  
15 complaint against you in any capacity since the year  
16 2000?

17 MR. HARRISON: Objection. Vague. My  
18 continuing objection to harassment and intimidation.

19 MS. RICHARDSON: Thank you. Thank you for  
20 acknowledging that. I heard you.

21 THE WITNESS: Do I -- I answer?

22 MR. ANDRE: To the extent you can answer the  
23 question without disclosing privileged communications.

24 THE WITNESS: I mean, Pamela Miller -- Pamela  
25 Miller sued -- tried to sue -- I think repeatedly,

1 several times, to sue me, I believe. We kept -- she  
2 kept getting shut down because it was all just  
3 extortion, but she kept trying.

4 BY MS. RICHARDSON:

5 Q. Were there any other employees that alleged  
6 misconduct over the years?

7 MR. HARRISON: Objection. Vague. Assumes  
8 facts not in evidence. Misleading. And to the extent  
9 that answering that question would involve giving  
10 information regarding a legal privilege, like  
11 attorney-client privilege --

12 MS. RICHARDSON: Let me rephrase the question.

13 MR. HARRISON: Let me -- let me finish.

14 MS. RICHARDSON: Okay.

15 MR. HARRISON: -- or legal advice that you got  
16 from an attorney, then I'm directing you not to answer.

17 If you can answer without relating to  
18 privileged information, then you can try and answer.

19 THE WITNESS: The -- I don't -- to my  
20 knowledge, no other -- no other -- nobody else filed  
21 than Pamela.

22 MS. RICHARDSON: Understood. So I want to be  
23 clear that as I'm asking you these questions, it doesn't  
24 relate to a filed lawsuit. A complaint could be those  
25 things I mentioned before. But let me try and get more

1 specific so that there's no doubt.

2 And I want to say for a second on the record,  
3 Mr. Harrison, with all due respect, I appreciate you  
4 guys protecting your client; but if it -- every time I  
5 ask a question you give that same long speech, we are  
6 going to go over the seven hours and then I'm going to  
7 have to compel for more days.

8 MR. HARRISON: I would -- you can try and do  
9 that, if you want. It's your right to try and do that,  
10 if you want. I can't imagine that that would be  
11 granted --

12 MS. RICHARDSON: Excellent. Well, I can't  
13 imagine --

14 MR. HARRISON: -- given all the -- given all  
15 the irrelevant questions that you --

16 MS. RICHARDSON: I think that -- I think that  
17 there's a good chance but -- but full stop, let's try --  
18 let me try to --

19 MR. HARRISON: I am just going to object to  
20 your direction to my client about the definition of a  
21 claim and what it was because it wasn't correct and --

22 MR. ANDRE: I will note for the record as well,  
23 part of the issue here is you are asking questions about  
24 legal proceedings; and when you start asking questions  
25 about legal proceedings, part of legal proceedings, we



1 have to make sure that our -- we're helping our client  
2 protect attorney-client privilege.

3 MS. RICHARDSON: That, I respect.

4 MR. ANDRE: So -- so -- so we need to do that.  
5 Now, if you're asking -- that's -- that is why we are  
6 doing this. And again, it is not -- and keep that in  
7 mind, please.

8 MS. RICHARDSON: I -- you know what I'm going  
9 to do? I'm going to -- I'm going to set this section  
10 aside. We'll come back to it. And then on a break I  
11 will do a little more due diligence just to make sure  
12 that I'm asking it in a way that we don't have to stop  
13 every time. Let's pivot for a minute.

14 BY MS. RICHARDSON:

15 Q. Ms. Thomson, you and I have known each other  
16 for more than 14 years; correct?

17 A. I haven't counted the number.

18 Q. Approximately.

19 A. If you say -- if you've done the math, I  
20 mean --

21 Q. Would you say that --

22 A. -- I'd say yes.

23 Q. We've known each for a long time?

24 A. Very long time.

25 Q. Would you describe our relationship during that

1 time as friends?

2 A. Very much so.

3 Q. Would you describe that relationship during  
4 that time, for the most part, as very close friends?

5 A. Very close. Close friends.

6 Q. You did not retain me under a written contract  
7 as staff or consultant; is that correct?

8 A. Very --

9 MR. HARRISON: Objection to the form.  
10 Compound. Speculative.

11 But you can answer to the best of your ability.

12 THE WITNESS: No. I did not retain you as  
13 staff or an employee of any sort.

14 BY MS. RICHARDSON:

15 Q. Sorry. Just give me one second.

16 A. Would you like a break?

17 Q. No. Shouldn't be the other way around.

18 Because I have a good memory and also because  
19 when I met you I was dating a man, I know that that was  
20 approximately in twenty -- 2009 to 2010.

21 Does that sound like it might be about right to  
22 you?

23 MR. HARRISON: Objection to form. Compound.

24 You can answer the question.

25 THE WITNESS: Probably approximate -- you would

Page 78

1 know. I --

2 MS. RICHARDSON: That's -- that's the -- that's  
3 one of the main markers.

4 MR. HARRISON: I'm sorry. I apologize. Can I  
5 just have that question read back. I missed it.

6 (The record is read by the reporter as  
7 follows:

8 "Q. Because I have a good memory and also  
9 because when I met you I was dating a man, I  
10 know that that was approximately in twenty --  
11 2009 to 2010.

12 "Does that sound like it might be about right  
13 to you?")

14 MR. HARRISON: Go ahead.

15 BY MS. RICHARDSON:

16 Q. Would you say accuracy is important, especially  
17 in testimony on record?

18 MR. HARRISON: Objection. Calls for  
19 speculation. Vague.

20 BY MS. RICHARDSON:

21 Q. Do you try to be accurate when you are giving  
22 testimony on record?

23 A. Yes. Yes, I do.

24 Q. Can I assume that during the Singapore  
25 arbitration you were trying to be accurate when you put

Page 79

1 statements on the record?

2 MR. HARRISON: Objection. Vague. Calls for a  
3 legal conclusion.

4 BY MS. RICHARDSON:

5 Q. Were you as accurate as you could be when you  
6 gave statements for -- in testimony related to your case  
7 against Persistence in the Singapore arbitration?

8 MR. HARRISON: Objection. Same objections.  
9 You can answer to the best of your ability.

10 THE WITNESS: Yes. Yes.

11 BY MS. RICHARDSON:

12 Q. Are you aware that in that witness statement  
13 you provided you said that we met in 2014?

14 MR. HARRISON: Objection. Calls for  
15 speculation.

16 You can answer to the best of your --

17 THE WITNESS: I don't recall. Sorry.

18 BY MS. RICHARDSON:

19 Q. You don't recall.

20 But as we sit here today, you agree -- and I  
21 understand, it is hard to remember dates sometimes --  
22 but that that timeline seems accurate to you, that we  
23 would have met -- sorry. Let me -- let me rephrase the  
24 question.

25 Do you remember where we met?

Page 80

1           A. Yes. We met at Beau's house by the pool, and  
2 you were dating Kevin at the time before you met  
3 Michelle.

4           Q. That's correct. Yes.

5           A. And you would remember that timeline --

6           Q. Yeah.

7           A. -- probably -- I'm sure better than me.

8           Q. I mean, depends on the day these days; but  
9 yeah.

10          A. I don't -- do not have the exact date. I would  
11 have to go back and start to look through calendars.

12          Q. Understand.

13          A. But I would trust your recollection on this  
14 one.

15          Q. Could you explain what you remember about our  
16 friendship from -- during those years. Let's just say  
17 approximately 2010 to 2015.

18                 MR. HARRISON: Objection. Vague. Calls for  
19 speculation.

20                 You can answer to the best of your ability.

21                 THE WITNESS: We -- we were good friends.

22 BY MS. RICHARDSON:

23           Q. And we spent a lot of time together when you  
24 were in Los Angeles; correct?

25           A. Yes.

Page 81

1 Q. And I flew to visit you in London.

2 Do you remember that?

3 A. Yes.

4 Q. In February of 2014 we went to see our mutual  
5 friend, Storm Large, perform in Palm Springs.

6 Do you remember that?

7 A. Yes.

8 Q. It was your birthday weekend, wasn't it?

9 A. Yes.

10 Q. Do you remember that Storm encouraged us to  
11 stay at the Saguaro hotel with her?

12 MR. HARRISON: Objection. Vague. And same  
13 intimidating and harassment --

14 BY MS. RICHARDSON:

15 Q. Do you remember that we stayed --

16 MR. HARRISON: -- objection -- let me just  
17 finish --

18 MS. RICHARDSON: Okay.

19 MR. HARRISON: -- that I've made before.

20 I see no relevance to this.

21 You can answer to the best of your ability.

22 THE WITNESS: I remember we stayed -- we stayed  
23 at -- I don't remember the name of it, but I remember we  
24 stayed somewhere where -- where you -- where you wanted  
25 to stay because Storm was, I believe, there and she was

Page 82

1 performing. And so the idea was that we would all be  
2 together. I believe that -- was Storm in another place?

3 BY MS. RICHARDSON:

4 Q. I think -- no. Storm wanted us to stay there.  
5 She -- I don't think it was -- any of us decided that.  
6 But Storm did decide --

7 A. Because it was -- she was your friend, and I  
8 had just -- I was in England when that was arranged, so  
9 I just flew in.

10 Q. Do you remember being upset with the  
11 accommodations?

12 MR. HARRISON: Objection. My same continuing  
13 objection.

14 Go ahead. You can answer.

15 THE WITNESS: I remember it wasn't an  
16 impressive place to have gotten off a 12-hour flight  
17 from London and go straight from the airport out there.

18 BY MS. RICHARDSON:

19 Q. Do you remember --

20 A. It was -- I remember it was uncomfortable. It  
21 wasn't -- it wasn't a great choice, but that's the  
22 choice that -- that was the -- that was the deal.

23 Q. Do you remember that there was no bell staff  
24 present?

25 A. Yeah. That would have been the case with that

Page 83

1 place.

2 Q. Do you remember yelling at me to take your  
3 bags?

4 MR. HARRISON: Objection to form.

5 Go ahead. You can answer.

6 THE WITNESS: No.

7 BY MS. RICHARDSON:

8 Q. Do you have any memory that Michelle and I paid  
9 for yours and Madeleine's hotel rooms during that stay?

10 A. Yes. Because you were treating me for my  
11 birthday.

12 Q. Yeah. I know this -- I'm just saying on the  
13 side, we did not choose that hotel.

14 MR. HARRISON: Objection.

15 THE WITNESS: Storm did, I remember. I  
16 remember it was driven by Storm performing there, and  
17 that's why we were there.

18 MR. HARRISON: Just going to object to the form  
19 for the record, obviously --

20 MS. RICHARDSON: I know. That was -- that  
21 was -- I totally get it. That was -- that was a bad --  
22 bad Ashley.

23 BY MS. RICHARDSON:

24 Q. When -- when we dined out did I typically offer  
25 to split the bill?



Page 84

1 MR. HARRISON: Objection. Vague.

2 Go ahead.

3 BY MS. RICHARDSON:

4 Q. Do you remember me --

5 A. Back then, I don't remember.

6 Q. Okay.

7 A. I don't --

8 Q. That's all right.

9 A. I don't remember.

10 Q. That's okay. You cannot remember. That's  
11 totally acceptable. That's an answer, so it's fine.  
12 You're not going to -- who's going to remember  
13 everything from back then?

14 Now, do you remember especially I would say  
15 from 2010 to 2016, when Beau was alive, that I would  
16 cook meals for all of us?

17 MR. HARRISON: Objection to form. Compound.

18 BY MS. RICHARDSON:

19 Q. Do you remember me cooking meals in your home?

20 A. There were very few. Very few. I remember you  
21 were up at Beau's house every weekend and you were  
22 always up there cooking.

23 Q. That's also true.

24 There was a period of time where -- I'll leave  
25 that off for now.

Page 85

1           Before you visited my home for the first  
2     time -- let me rephrase this question.

3           Do you remember coming to my home for the first  
4     time?

5           A.   I don't remember exactly when it was.

6           Q.   Okay.   That's --

7           A.   Yeah.

8           Q.   You didn't visit my home often; is that  
9     correct?

10          A.   Not that often, no.

11          Q.   Okay.   Do you have a memory of visiting my  
12     home -- do you have a memory of us going to dinner after  
13     you visited my home where you told me I could not pay  
14     for the meal because I was poor?

15          A.   No.

16          MR. HARRISON:   Objection.

17     BY MS. RICHARDSON:

18          Q.   Okay.

19          A.   I answered that "no"; right?

20          Q.   Yeah.   You don't remember?   That --

21          MR. HARRISON:   Objection.   Asked and answered.

22     BY MS. RICHARDSON:

23          Q.   Okay.   During a trip to Italy in 2021, the last  
24     trip we took together -- I cannot recall the name of the  
25     restaurant, but do you remember us dining at a